



Action Plan for the Istanbul Convention for 2022–2025

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ISBN pdf: 978-952-00-9704-2

ISSN pdf: 1797-9854

Layout: Government Administration Department, Publications

Cover photos: Tuula Holopainen, Irmeli Huhtala, Kuvatoimisto Rodeo, Shutterstock

Helsinki 2022 Finland

Action Plan for the Istanbul Convention for 2022–2025

Publications of the Ministry of Social Affairs and Health 2022:10

Publisher	Ministry of Social Affairs and Health		
Editor(s)	Taina Riski and Minna Viuhko		
Group author	Committee for combating violence against women and domestic violence (NAPE)		
Language	Finnish	Pages	58

Abstract

The Committee for combating violence against women and domestic violence (NAPE) is tasked with preparing a plan for implementing the Istanbul Convention (Finnish Treaty Series 53/2015). The purpose of the Action Plan for 2022–2025 is to promote the national implementation of the Istanbul Convention ratified by Finland in 2015. This Action Plan is the second of its kind. The first Action Plan covered the years 2018–2021.

The preparatory work for the Action Plan took into account the ongoing government-level work closely related to the subject, such as the National Action Plan for the Lanzarote Convention (Ministry of Social Affairs and Health) and the Action Plan for Combating Violence Against Women (Ministry of Justice) and other measures for preventing violence that are based on the Government Programme.

The Action Plan includes long-term objectives and a total of 36 measures to be implemented in 2022–2025. The objectives are largely based on the recommendations issued by GREVIO. The three main objectives aim at strengthening the gender perspective and intersectionality in the implementation of the Istanbul Convention, reinforcing intersectoral and multiprofessional cooperation and improving both the identification of violence against women and domestic violence and intervention in them.

The Committee for combating violence against women and domestic violence monitors the implementation of the Action Plan regularly by means of a separate implementation and monitoring tool. If necessary, the measures of the Action Plan can be specified and complemented.

Keywords violence, domestic violence, status of women, gender equality, discrimination, human rights, international treaties

ISBN PDF	978-952-00-9704-2	ISSN PDF	1797-9854
URN address	https://urn.fi/URN:ISBN:978-952-00-9704-2		

Istanbulin sopimuksen toimeenpanosuunnitelma vuosille 2022–2025

Sosiaali- ja terveysministeriön julkaisuja 2022:10**Julkaisija** Sosiaali- ja terveysministeriö**Toimittaja/t** Taina Riski ja Minna Viuhko**Yhteisötekijä** Naisiin kohdistuvan väkivallan ja perheväkivallan torjunnan toimikunta (NAPE)**Kieli** suomi**Sivumäärä** 58**Tiivistelmä**

Naisiin kohdistuvan väkivallan ja perheväkivallan torjunnan toimikunnan (NAPE) tehtävänä on laatia suunnitelma ns. Istanbulin sopimuksen (SopS 53/2015) toimeenpanosta. Vuosille 2022–2025 laaditun toimeenpanosuunnitelman tarkoituksena on edistää Suomen vuonna 2015 ratifioiman sopimuksen kansallista täytäntöönpanoa. Toimeenpanosuunnitelma on järjestyksessään toinen. Ensimmäinen suunnitelma kattoi vuodet 2018–2021.

Toimeenpanosuunnitelman valmistelutyössä on huomioitu meneillään oleva, aiheeseen läheisesti liittyvä valtionhallinnon tasolla tapahtuva työ kuten esimerkiksi ns. Lanzaroten sopimuksen kansallinen toimeenpanosuunnitelma (STM) ja Naisiin kohdistuvan väkivallan torjuntaohjelma (OM) sekä muut hallitusohjelmakirjauksiin perustuvat väkivallan ehkäisyyn liittyvät toimet.

Toimeenpanosuunnitelma sisältää pitkän ajan tavoitteita sekä 36 vuosina 2022–2025 toteutettavaa toimenpidettä. Tavoitteet perustuvat pääosin GREVION suosituksiin. Kolmella päätavoitteella pyritään vahvistamaan sukupuolinäkökulmaa ja intersektionaalisuutta Istanbulin sopimuksen toimeenpanossa, poikkihallinnollista ja moniammatillista yhteistyötä sekä naisiin kohdistuvan väkivallan ja perheväkivallan tunnistamista ja siihen puuttumista.

NAPE seuraa suunnitelman toimeenpanoa säännöllisesti erillisen toteutus- ja seurantavälineen avulla. Suunnitelman toimenpiteitä voidaan tarvittaessa tarkentaa ja täydentää.

Asiasanat väkivalta, perheväkivalta, lähisuhdeväkivalta, naisen asema, tasa-arvo, syrjintä, ihmisoikeudet, kansainväliset sopimukset**ISBN PDF** 978-952-00-9704-2**ISSN PDF** 1797-9854**Julkaisun osoite** <https://urn.fi/URN:ISBN:978-952-00-9704-2>

Plan för genomförandet av Istanbulkonventionen under perioden 2022–2025

Social- och hälsovårdsministeriets publikationer 2022:10

Utgivare	Social- och hälsovårdsministeriet		
Redigerare	Taina Riski och Minna Viuhko		
Utarbetad av	Kommissionen för bekämpning av våld mot kvinnor och av våld i hemmet		
Språk	finska	Sidantal	58

Referat

Kommissionen för bekämpning av våld mot kvinnor och av våld i hemmet har till uppgift att utarbeta en plan för genomförandet av den s.k. Istanbulkonventionen (FördrS 53/2015). Syftet med genomförandeplanen för perioden 2022–2025 är att främja det nationella genomförandet av den överenskommelse som Finland ratificerade 2015. Genomförandeplanen är den andra i ordningen. Den första planen omfattade åren 2018–2021.

I beredningen av genomförandeplanen har man beaktat det pågående arbetet inom hela statsförvaltningen som är nära förknippad med frågan, till exempel den nationella genomförandeplanen för den s.k. Lanzarotekonventionen (social- och hälsovårdsministeriet) och programmet för bekämpning av våld mot kvinnor (justitieministeriet) samt andra åtgärder för förebyggande av våld som baserar sig på skrivningarna i regeringsprogrammet.

Genomförandeplanen innehåller långsiktiga mål samt 36 åtgärder som ska vidtas under perioden 2022–2025. Målen baserar sig i huvudsak på rekommendationer av Europarådets expertgrupp GREVIO. De tre huvudmålen syftar till att stärka könsperspektivet och intersektionaliteten i genomförandet av Istanbulkonventionen, det förvaltningsövergripande och multiprofessionella samarbetet samt identifieringen av och ingripandet i våld mot kvinnor och familjevåld.

Kommissionen för bekämpning av våld mot kvinnor och av våld i hemmet följer regelbundet upp hur planen genomförs med hjälp av ett separat verktyg för genomförande och uppföljning. De åtgärder som ingår i planen kan vid behov preciseras och kompletteras.

Nyckelord våld, familjevåld, kvinnans ställning, jämställdhet, diskriminering, mänskliga rättigheter, internationella överenskommelser

ISBN PDF	978-952-00-9704-2	ISSN PDF	1797-9854
URN-adress	https://urn.fi/URN:ISBN:978-952-00-9704-2		

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1 Introduction

1.1 Preparation and premises of the Action Plan

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, known as the 'Istanbul Convention', entered into force in Finland in August 2015. Its entry into force has played a significant role in promoting efforts to prevent violence against women and domestic violence and introducing the phenomenon to broader social debate.

The task of drawing up action plans for the Istanbul Convention has been assigned by Government Decree to the Committee for Combating Violence against Women and Domestic Violence (hereinafter the 'NAPE Committee') attached to the Ministry of Social Affairs and Health¹. Operating since the beginning of 2017, the NAPE Committee was set up to assume the role of the coordinating body for national action required under Article 10 of the Istanbul Convention.

The purpose of the Action Plan drawn up by the NAPE Committee for 2022–2025 is to continue and strengthen the implementation of the Istanbul Convention in Finland. The objectives and measures included in the Action Plan are based on the obligations set out in the Istanbul Convention and special attention has been dedicated to the recommendations issued to Finland in 2019 by the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO)², an independent body supervising the implementation of the Convention. This Action Plan is the second of its kind. The first Action Plan for the Istanbul Convention drawn up by the NAPE Committee was published in 2017³. It covered the period from 2018 to 2021 and included 48 measures, which have mostly been implemented. A separate evaluation report has been drawn up on the plan⁴.

1 Government Decree 1008/2016. Available in Finnish at: <https://www.finlex.fi/fi/laki/alkup/2016/20161008>.

2 GREVIO Baseline Evaluation Report Finland. 2019. Available in English at: <https://rm.coe.int/grevio-report-on-finland/168097129d> (see Appendix 2).

3 Action plan for the Istanbul Convention for 2018–2021. Publications of the Ministry of Social Affairs and Health 2017:16. Available in English (2017:18) at: <http://urn.fi/URN:ISBN:978-952-00-3972-1>.

4 The evaluation report will be published in the Reports and Memorandums series of the Ministry of Social Affairs and Health in 2022.

Preparation of the Action Plan

The Action Plan was prepared by the working committee and General Secretary of the NAPE Committee. As part of its preparatory work, the NAPE Committee sent a survey to the NGO working group (JÄTY) operating under its auspices in June 2021. The purpose of the survey was to provide information on the status of implementation of the Istanbul Convention in Finland from the perspective of non-governmental organisations (NGOs). The questionnaire was filled in by 20 parties involved in the NGO working group. The NAPE Committee also organised three workshops, which were attended by parties represented in the NAPE Committee, representatives of NGOs, regional healthcare and social welfare authorities, researchers and other experts. Each workshop had about 39–45 participants representing different parties. The proposals and observations produced in the workshops serve as the basis for the measures of the Action Plan.

The preparatory work for the Action Plan took into account the currently ongoing central government efforts closely linked to the theme. Prime Minister Sanna Marin's Government Programme includes several measures that aim to combat violence against women and domestic violence or are otherwise closely associated with the theme. One of the most important of these is the Action Plan for Combating Violence against Women for 2020–2023⁵, which is included in the Government Programme and coordinated by the Ministry of Justice. That Action Plan was prepared in close cooperation with the NAPE Committee. The work carried out under the Action Plan coordinated by the Ministry of Justice was likewise taken into account in this new Action Plan for the Istanbul Convention in order to avoid overlaps. Measures that are closely linked to the implementation of the Istanbul Convention are also included in the Action Plan for the Prevention of Violence against Children 2020–2025, entitled 'Non-Violent Childhoods'⁶; the Implementation plan for the National Child Strategy⁷; and the national action plan currently being prepared for the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, known as the 'Lanzarote Convention'. With regard to children and young people, the preparatory work also took account of the action plan to prevent bullying, teasing, violence and harassment in early childhood education, schools and

5 Publications of the Ministry of Justice. Memorandums and statements 2020:15. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-835-6>.

6 Väkivallaton lapsuus 2020-2025: toimeenpano ja viestintä [*Non-Violent Childhoods 2020–2025 – implementation and communication*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2021:17. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-00-5406-9>.

7 Kansallisen lapsistrategian toimeenpanosuunnitelma: Valtioneuvoston periaatepäätös [*Implementation plan for the National Child Strategy: Government Resolution*]. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-383-868-0>.

other educational institutions⁸. The measures set out in the Action Plan against Trafficking in Human Beings⁹ are also linked to combating violence against women, particularly in terms of human trafficking for the purpose of sexual exploitation. Furthermore, measures to combat violence against women are also included in the Government Action Plan for Gender Equality 2020–2023¹⁰.

Monitoring of the Action Plan

This second national Action Plan for the Istanbul Convention contains long-term objectives which the plan aims to advance and measures geared towards initiating or implementing the necessary change. The objectives are mainly based on the observations and recommendations set out in GREVIO's country report on Finland. The progress of the measures to be implemented over the next four years will be monitored annually by means of an implementation and monitoring tool due to be developed in the first half of 2022. The tool will enable monitoring the progress of implementation of each measure, while also taking account of the work carried out in other national programmes and by other parties, such as NGOs involved in violence prevention work. The intention is to also allow the measures included in the Action Plan to be specified and complemented as required. This will make it possible to implement the Istanbul Convention in a manner responsive to significant changes in both international and national operating environments and phenomena of violence against women as they are changing form.¹¹ Monitoring is also used to collect data required as the basis for assessing the impact of the measures.

8 Toimenpideohjelma kiusaamisen, väkivallan ja häirinnän ehkäisemiseksi varhaiskasvatuksessa, kouluissa ja oppilaitoksissa [*Action plan to prevent bullying, teasing, violence and harassment in early childhood education, schools and other educational institutions*]. Opetus- ja kulttuuriministeriö [Ministry of Education and Culture] 26 January 2021.

9 Finland fights human trafficking – Action Plan against Trafficking in Human Beings. Available in English at: <http://urn.fi/URN:ISBN:978-952-259-824-0>.

10 Making Finland a Global Leader in Gender Equality: Government Action Plan for Gender Equality 2020–2023. Publications of the Ministry of Social Affairs and Health 2020:35. Available in English (2021:10) at: <http://urn.fi/URN:ISBN:978-952-00-8666-4>.

11 Violence, stalking and harassment by digital means are examples of the new forms of violence against women and these phenomena should also be monitored as part of implementing the Istanbul Convention, paying special attention to the GREVIO's General Recommendation on the digital dimension of violence against women (available in English at: <https://rm.coe.int/grevio-rec-no-on-digital-violence-against-women/1680a49147>). Measures to prevent digital violence are included in the Action Plan for Combating Violence against Women coordinated by the Ministry of Justice (available in Finnish with English abstract at: <http://urn.fi/URN:ISBN:978-952-259-835-6>).

No specific funds have been allocated for the implementation of the measures included in the Action Plan, as the aim is to carry them out primarily within the spending limits set for different administrative branches.

Contents of the Action Plan

The Action Plan is divided into four parts, generally corresponding to the outline of the Istanbul Convention (prevention, protection, prosecution, coordinated policies). The first part deals with prevention of violence against women and domestic violence. The second part covers support and services provided for victims of violence and other parties involved. The third part focuses on preventing further violence and enforcing criminal accountability. The fourth part looks at the coordination of various measures and policies, as well as data collection and its coordination.

The Action Plan has three cross-cutting goals under which almost all of its measures can be placed. The goals aim to strengthen:

- the gender perspective and intersectionality in the national implementation of the Istanbul Convention in order to prevent and combat violence against women;
- intersectoral and multiprofessional cooperation in preventing and combating violence against women and domestic violence at all levels;
- the identification of and intervention in violence against women and domestic violence.

Strengthening the gender perspective and intersectionality in the context of implementing the Istanbul Convention is linked to the key principles of the Convention. Similar to any other human rights standards, the Istanbul Convention is permeated by the cross-cutting principles of equality and non-discrimination, which require that all human rights be equally safeguarded for all people without discrimination.¹²

The Istanbul Convention involves a strong ambition to promote gender equality. The Convention defines violence against women as structural discrimination against

12 Törmä, Sinikka ja Pentikäinen, Merja: Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi – Naisiin kohdistuvan väkivallan vähentämisen ohjelmasta Istanbulin sopimuksen toimeenpanoon [*Towards a Finland Free of Violence against Women and Domestic Violence – From the Action Plan to Reduce Violence against Women to the implementation of the Istanbul Convention*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2016:15. Available in Finnish at: <http://urn.fi/URN:ISBN:978-952-00-3707-9>.

women. GREVIO has noted that Finland's approach to national prevention of violence is characterised by gender neutrality, which fails to pay sufficient attention to gendered violence targeted at women because of their gender and the resulting special needs of women. Consequently, specific focus on women should be taken into account in implementing the measures focusing on prevention as well as those relating to victim support services and protection.

The GREVIO's country report on Finland includes several references to intersectionality, prevention of intersectional discrimination and the importance of taking minorities and women in vulnerable situations into account in national measures to combat violence. By way of example, GREVIO highlights the higher risk of violence against women with disabilities and migrant women, encouraging Finland to take vulnerability into account in the provision of anti-violence programmes and support services and in training provided for professionals.

Furthermore, GREVIO notes that ethnic and cultural backgrounds and gender diversity have a bearing on seeking help and reporting violence, which requires public authorities to be sensitive to recognising the different circumstances of victims of violence and ensuring the enforcement of victims' rights¹³. It is of the utmost importance that different assistance needs and gender and cultural sensitivity are taken into account in the service system in order to ensure equality and the availability and accessibility of services.

The second objective cutting across the Action Plan is to **strengthen intersectoral and multiprofessional cooperation in preventing violence**. This means, for example, that the Action Plan is implemented and monitored both in intersectoral terms, i.e. across administrative branches, and in close cooperation with NGOs, stakeholders and key parties operating in the fields of human rights and equality. In addition to cooperation at the central government level, intersectoral coordination should also be strengthened in municipalities and forthcoming wellbeing services counties. It is important to engage NGOs and other non-public bodies in the development and structures of cooperation at all levels in keeping with GREVIO's recommendation.

The identification of and intervention in violence against women and domestic violence are key prerequisites for making gendered violence visible and helping victims. Addressing violent behaviours and the underlying themes related to values and attitudes in public debate and in education and training should be further strengthened as a

13 The GREVIO report on Finland mentions Sámi and Roma women and those with a high likelihood of facing honour-related violence, for example (see <https://rm.coe.int/grevio-report-on-finland/168097129d>, p. 12).

preventive measure. The ability of healthcare and social welfare, the police and judicial authorities to identify different forms of violence and refer victims and other parties involved in a violent situation to services requires extensive expertise, including a trauma-aware and gender and culturally sensitive approach. In order to identify violence against women, it is necessary to make this diverse phenomenon widely visible in society, including statistics, education and training, the forthcoming healthcare and social welfare structures in wellbeing services counties and municipalities, and in guidelines and regulations issued to public authorities.

1.2 Prevalence of violence against women and domestic violence

Violence against women is a significant human rights and gender equality problem in Finland. Data on the prevalence of violence against women is available from several sources. The prevalence of violence against women and domestic violence can be monitored and assessed by means of incidents brought to the attention of the authorities and studies known as 'crime victim surveys', which aim to also estimate the extent of the incidents that do not reach the attention of the authorities. Crime victim surveys also examine aspects such as the forms of violence that victims have experienced. It has been estimated that a large proportion of incidents of violence against women constitute unreported crime that remains hidden from the authorities¹⁴.

The European Union Agency for Fundamental Rights estimated in 2014 that one in three European women had experienced physical and/or sexual violence since the age of 15, while one in five had been stalked and every second woman had experienced one or more forms of sexual harassment. The survey indicated that women experience considerably more violence in the Nordic countries when compared with other EU countries. Among Finnish women aged 18–74 years who responded to the survey, 47% had experienced physical and/or sexual violence since the age of 15. Those who had experienced physical and/or sexual violence by a current or former partner since the age of 15 accounted for

14 According to a 2014 survey carried out by the European Union Agency for Fundamental Rights, only about 10% of incidents of partner violence against women came to the attention of the authorities in Finland. (Violence against women: an EU-wide survey. Main results. European Union Agency for Fundamental Rights, 2014.)

30% of respondents. Well over one third of Finnish women had experienced violence by a non-partner in their lifetime.¹⁵

Despite enhanced measures to prevent violence, its prevalence has not seen any significant reduction over the last decade. According to Statistics Finland's data¹⁶, domestic and intimate partner violence offences recorded by the police involved 10,800 victims in 2020, which was 1.2% down on the previous year. One half of incidents of domestic and intimate partner violence directed at adults took place between married or cohabiting couples. Of adult victims, 75.2% were women. Recurrence is typical of intimate partner violence. Around 20% of victims, or 1,700 individuals, had become victims of domestic and intimate partner violence more than once in 2020. There were 1,400 adult victims of repeated violence, 80% of whom were women.

In 2019, a total of 18 people died in intimate partner homicides, including 15 women and three men. The figures also include individuals killed by a former spouse or dating partner. Nevertheless, the trend in intimate partner homicides against women, in particular, has been positive in recent years. The annual numbers of intimate partner homicides declined by over 20% between 2010 and 2019, from the average of 17 victims in the first half of the decade to 13 in the latter half. Over the same period, the annual numbers of intimate partner homicides against men remained stable at an average of five.¹⁷

Incidents of sexual violence brought to the attention of the authorities increased in 2021. The number of rapes reported was 1,806, or 356 cases (24.6%) more than in 2020. In addition, 1,415 other sexual offences were reported, including 726 cases of sexual harassment, amounting to 171 cases (30.8%) more than in 2020.¹⁸

The results of the most recent School Health Promotion Study from 2021 also show an increase in sexual harassment and unwelcome advances. Almost every second girl and just over one in ten boys in grades 8 and 9 of lower secondary school (aged 14–15) had experienced unwanted sexual propositions or advances over the last 12 months. In the

15 Violence against women: an EU-wide survey. Main results. European Union Agency for Fundamental Rights, 2014. Statistics Finland is participating in a Eurostat research project on gendered violence in 2021–2022. Tilasto-ohjelma 2021–2023 [Statistical programme 2021–2023]. Liite 3 [Appendix 3]. Tilastokeskuksen tiedonkeruut 2021 [Statistics Finland's data collections 2021]. Available in Finnish at: https://www.stat.fi/static/media/uploads/org/tilastokeskus/tilasto-ohjelma_2021-2023_liite_3_tilastokeskuksen_tiedonkeruut_2021.pdf.

16 Statistics Finland: Statistics on offences and coercive measures 2020.

17 Tilastoraportti [Statistical Reports] 3/2021. Lähisuhdeväkivalta [Intimate partner violence] 2019. Finnish Institute for Health and Welfare.

18 Statistics Finland: Statistics on offences and coercive measures 2021, 4th quarter.

same age group, 13% of girls and 5% of boys had faced sexual violence. Experiences of sexual violence had increased significantly among girls over the last two years.¹⁹

Nowhere near all of the forms of violence against women are covered by comprehensive and regular monitoring data available on its prevalence. For instance, no precise data is available on the prevalence of forced marriage in Finland and little research has so far been done on the subject in Finland.²⁰ Nor has any comprehensive register data been systematically collected on the prevalence of female genital mutilation (FGM) in Finland, as is also the case in many other countries.

Consequently, no accurate estimates can be given of the numbers of girls and women who have undergone or are at risk of FGM²¹.

The international #MeToo campaign has drawn unprecedented attention to the prevalence of sexual harassment against women in Finland as well. The Gender Equality Barometer, published as early as in 2017, indicates that 38% of women and 17% of men had experienced sexual harassment over the last two years. Young women faced sexual harassment more frequently than others: more than half (56%) of women aged under 35 had experienced harassment over the previous two years. Gender-related hate speech had sometimes been experienced by 15% of women and 8% of men.²²

Online and technology-facilitated digital violence, stalking and harassment have increased significantly in recent years. According to the results of a 2020 population study conducted by Statistics Finland on the use of information and communications

19 School Health Promotion Study 2021. Finnish Institute for Health and Welfare. The data covers pupils in grades 8 and 9 who responded to the School Health Promotion Study. School Health Promotion Study results service (in Finnish): www.thl.fi/kouluterveyskysely/tulokset. There is also a study on violence in young people's dating relationships (in Finnish): Tuulia Kovanen. 2019: Seurustelun ei kuulu satuttaa [*Dating shouldn't hurt*]! Suomalaisten nuorten kokemuksia seurusteluväkivallasta [*Experiences of dating violence among young Finns*]. Ensi- ja turvakotien liitto [*Federation of Mother and Child Homes and Shelters*].

20 Arviomuistio avioliittoon pakottamisen rangaistavuudesta [*Memorandum on the Punishability of Forcing a Person to Enter into Marriage*]. Publications of the Ministry of Justice. Memorandums and statements 2021:29. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-820-2>; Virve Toivonen. 2017. Pakkoavioliittojen esiintyminen ja ilmitulo Suomessa [*Prevalence and detection of forced marriage in Finland*]. Discussion paper. Institute of Criminology and Legal Policy. University of Helsinki.

21 Action plan for the prevention of female genital mutilation (FGM). Publications of the Ministry of Social Affairs and Health 2021:16. English translation of an older version (2019:7) available at: <http://urn.fi/URN:ISBN:978-952-00-8666-4>.

22 Gender Equality Barometer 2017. Publications of the Ministry of Social Affairs and Health 8/2018. Available in English (12/2018) at: <http://urn.fi/URN:ISBN:978-952-00-4012-3>.

technology, 39% of Finns had seen hate speech on social media over the last three months. Inappropriate advances had been made online to nine per cent of men and 17% of women, while six per cent of men and seven per cent of women had been harassed. People aged 16–34, especially young people, face considerably more harassment and inappropriate advances than older age groups. One in every three young people had experienced inappropriate advances.²³ Digitalisation has also changed the experience of violence while also offering new tools and arenas for intimate partner violence and stalking, for example.²⁴

Women also experience violence and harassment in the workplace. According to the latest Quality of Work Life Survey from 2018, almost one in every five women (18%) and four per cent of men reported having experienced sexual harassment in the workplace at some point during their careers. Sexual harassment is particularly a problem faced by young women in the world of work. The above-mentioned Quality of Work Life Survey indicates that 29% of women aged 15–24 had experienced sexual harassment during the past twelve months. Seven per cent of the youngest respondents, representing the 15–24 age group, reported having been sexually harassed at least on a weekly basis.²⁵

Minority status and vulnerable situations increase the risk of exposure to harassment and violence. According to a study commissioned by the Ministry of the Interior in 2018, women with disabilities and those of foreign origin, for example, experience violence two to three times as frequently as women belonging to the majority population. The same study suggests that women of foreign origin have almost double the risk of being raped when compared with native-born women.²⁶ According to the 2017 Gender Equality Barometer, over one fifth of women self-identifying with a minority group had experienced hate speech²⁷.

23 Use of information and communications technology by individuals 2020. Statistics Finland. Available in English at: https://www.stat.fi/til/sutivi/2020/index_en.html.

24 Louna Hakkarainen: Digitaalinen väkivalta parisuhteessa ja sen jälkeen [*Digital violence during and after an intimate relationship*]. Opas väkivallan kokijalle, ammattilaiselle ja läheiselle [*Guide to victims of violence, professionals and loved ones*]. In Finnish. National Women's Line in Finland. 2019.

25 Sutela, H. & Pärnänen, A. & Keyriläinen, M. 2019. Digiajan työelämä – Työolotutkimuksen tuloksia 1977–2018 [*Working life in the digital age – results of the Quality of Work Life Surveys 1977 to 2018*]. Suomen virallinen tilasto [*Official Statistics of Finland*]. Statistics Finland.

26 Onko Suomi maailman turvallisimaa kaikille [*Is Finland the Safest Country for Everybody?*] Turvallisuuden toteutuminen eri sukupuolten ja väestöryhmien kannalta [*Realisation of safety in respect of different genders and population groups*]. KPMG Oy Ab 25 May 2018.

27 Gender Equality Barometer 2017. Publications of the Ministry of Social Affairs and Health 8/2018. Available in English (12/2018) at: <http://urn.fi/URN:ISBN:978-952-00-4012-3>.

Sexual and gender (LGBTQI) minorities face higher exposure to violence. A study published by the European Union Agency for Fundamental Rights in 2014 indicates that 40% of Finnish LGBTQI respondents to the survey had experienced violence²⁸. According to the 2019 School Health Promotion Study, young LGBTQI people face more harassment than their peers. The same study also suggests that over 40% of them had experienced psychological violence by parents or other adult carers over the previous 12 months.²⁹ According to the latest School Health Promotion Study (2021), young people with disabilities experienced physical threats, sexual harassment and sexual violence more frequently than others. Young people with disabilities experience physical and psychological violence by parents or other adult carers more frequently than other young people.³⁰ Belonging to several minorities at the same time may increase vulnerability to gendered violence.

No population-level data is currently available on the effects of the COVID-19 pandemic and related restrictive measures on the prevalence of violence against women and domestic violence in Finland. According to 2020 statistical data published by Statistics Finland, domestic and intimate partner violence offences declined by 1.2% on the previous year. Violence against children decreased by a total of 15% in all age groups compared with the previous year. Conversely, incidents of violence between spouses recorded by the police, for example, increased by just under seven per cent, amounting to an increase of nearly 300 cases.

Reports of violence between spouses have shown an increase for a couple of years now. Conversely, acts by former spouses declined in 2020.³¹

However, the COVID-19 pandemic has been found to have increased service needs among people experiencing domestic and intimate partner violence both internationally and in

28 Seksuaali- ja sukupuolivähemmistöön kuuluvien perus- ja ihmisoikeudet Suomessa [*Fundamental and human rights of sexual and gender minorities in Finland*]. Ministry of Justice. Reports and guidelines 34/2014. Available in Finnish at: <http://urn.fi/URN:ISBN:978-952-259-388-7>.

29 School Health Promotion Study 2019. Finnish Institute for Health and Welfare. Results service available in Finnish at: thl.fi/kouluterveyskysely/tulokset.

30 School Health Promotion Study 2021. Finnish Institute for Health and Welfare. School Health Promotion Study results service available in Finnish at: www.thl.fi/kouluterveyskysely/tulokset.

31 Kimmo Haapakangas 1 June 2021: Vanhempien lapsiinsa kohdistama väkivalta väheni koronavuonna [*Violence against children by parents decreased during the pandemic year*]. Statistics Finland. Tieto & trendit [*Data & Trends*]. Articles. Available in Finnish at: <https://www.stat.fi/tietotrendit/artikkelit/2021/vanhempien-lapsiinsa-kohdistama-vakivalta-vaheni-koronavuonna-avopuolisoiden-valiset-teot-kasvoivat-eniten/>.

Finland. The need for assistance has been reflected, in particular, in a significant increase in the use of phone and chat services.³² In light of information reported to the authorities, however, it is too early to make any definite statements on the overall effects of the COVID-19 pandemic on domestic and intimate partner violence and not even close to all of the incidents are reported to the police. Further information on the effects of the pandemic on the experiences of domestic violence and use of services will be obtained in the near future from sources such as a research project coordinated by the Finnish Institute for Health and Welfare³³.

32 Lähisuhdeväkivalta koronapandemian aikana vauvaperheiden vanhemmilla ja Nollalinjan auttavan puhelimen keskusteluissa [*Domestic violence during the COVID-19 pandemic among parents of families with newborns and in Nollalinja helpline conversations*]. Finnish Institute for Health and Welfare. Tutkimuksesta tiiviisti [*Research Reviews*] 2/2021 (Johanna Hietämäki, Anniina Kaittila, Jarno Tuominen, Maaret Vuorenmaa, Marita Husso, Joonas Peltonen, Anu Karhinen-Soppi); Ensi- ja turvakotien liitto [*Federation of Mother and Child Homes and Shelters*] 17 February 2021 (1/2021): <https://ensijaturvakotienliitto.fi/enska/korona-mullisti-avun-hakemisen/>, in Finnish.

33 Impacts of the coronavirus epidemic on experiences of domestic violence and the use of services (KOVÄ). Available in English at: <https://thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/impacts-of-the-coronavirus-epidemic-on-experiences-of-domestic-violence-and-the-use-of-services-kova->.

2 Objectives and measures

2.1 Prevention of violence against women and domestic violence

Prevention of and proactive intervention in violence against women and domestic violence play a key role in the Istanbul Convention. The Convention contains several obligations aimed at changing people's attitudes, breaking gender stereotypes and increasing awareness of the different forms of violence. Among other things, the Convention obliges public authorities to undertake awareness-raising efforts to prevent violence against women and to include teaching material on issues such as equality between women and men, gender roles, mutual respect, non-violent conflict resolution in interpersonal relationships, gender-based violence against women and the right to personal integrity in formal curricula at all levels of education. Furthermore, the Convention requires that appropriate training be organised for professionals working with victims or perpetrators of acts of violence covered by the scope of the Convention.

Prevention of violent behaviour has played a key role in the national work to combat violence in recent years. The contributions of the Action Plan to Reduce Violence against Women (2010–2015)³⁴ included developing the safety skills of children and young people, providing training on violence for education and training professionals, carrying out a campaign against sexual violence, and offering training on violence against women for people liable for non-military service. More than half of the measures included in the first Action Plan for the Istanbul Convention³⁵, implemented in 2018–2021, were related to the prevention of violence. In many respects, the first plan continued the work started within the Action Plan to Reduce Violence against Women. Prevention is also a cross-cutting theme in the ongoing Action Plan for Combating Violence against Women coordinated by the Ministry of Justice. Many of the measures included in that plan focus on increasing broad awareness of different forms of violence and improving competence among the authorities.

34 Naisiin kohdistuvan väkivallan vähentämisen ohjelma [*Action Plan to Reduce Violence against Women*]. Publications of the Ministry of Social Affairs and Health 2010:5. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-00-3031-5>.

35 Action plan for the Istanbul Convention for 2018–2021. Publications of the Ministry of Social Affairs and Health 2017:16. Available in English (2017:18) at: <http://urn.fi/URN:ISBN:978-952-00-3972-1>.

GREVIO has notified Finland of the fact that its perspective on the prevention of violence against women and domestic violence is gender neutral and that national efforts fail to draw sufficient attention to the gendered nature of this phenomenon, which is mainly targeted at women because of their gender. Furthermore, GREVIO strongly encourages Finland to pay attention to the status of minority groups or vulnerable people in the implementation of the Istanbul Convention.

The challenges for preventing violence mentioned in responses to the survey sent to the NAPE Committee's NGO working group included lack of understanding of the gendered nature of the Istanbul Convention and insufficient measures to prevent violence by means such as changing attitudes and behaviours. Other challenges raised in responses included gaps in the know-how of the authorities and the allocation of funding for violence prevention work (incl. NGOs) to projects, i.e. the lack of continued funding for activities.

The Action Plan for Combating Violence against Women³⁶ contains several measures aimed at meeting the needs of increasing public awareness and improving competence among prison and probation authorities in particular. Likewise, the first National Action Plan for the Lanzarote Convention, due to be published in 2022, proposes many measures aimed at increasing awareness of sexual violence and abuse against children.

Provision of training for authorities and professionals has been increased in different ways in recent years. The first Action Plan for the Istanbul Convention included a measure to develop an online training course entitled 'Intervene in violence' for the police and healthcare and social welfare professionals to recognise and intervene in domestic violence. The online training course was released in 2019 and is maintained and further developed by the Finnish Institute for Health and Welfare. As part of the Action Plan for Combating Violence against Women, the online training course will be expanded during 2022 with content on honour-related violence and digital violence. Furthermore, the online training course includes a specific training package on gendered violence for professionals working in schools and other educational institutions. The training package was developed as part of the EraseGBV project³⁷.

Education on domestic and intimate partner violence and violence against women has been developed and increased in police training, especially in the last few years.

36 Publications of the Ministry of Justice. Memorandums and statements 2020:15. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-835-6>.

37 Project website available in English at: <https://projects.tuni.fi/erasegbv/>.

These themes have been taken into account as part of the Bachelor's and Master's degree programmes provided by the Police University College and in police officers' in-service training, in particular following certain decisions issued by the supreme overseers of legality. The Police University College is providing a training module on prevention of intimate partner violence and related recidivism in 2021–2022³⁸.

The Action Plan for Combating Violence against Women as a whole contains several measures aimed at providing both the police and prison and probation professionals with training on the different forms of violence against women³⁹. The Action Plan also includes measures to train shelter workers, Multi-Agency Risk Assessment Conferences (MARACs)⁴⁰ and teachers and student teachers.

The GREVIO's country report contains several recommendations for enhancing the efficiency of police action. Among other things, the recommendations urge Finland to introduce systematic and mandatory initial and in-service training on all forms of violence covered by the Istanbul Convention for all law-enforcement officers and prosecutors. GREVIO also expects that training for professionals involved in violence prevention work is based on clear protocols and guidelines and takes the particular characteristics and needs of vulnerable groups into account. Training should also take into account the characteristics of different forms of violence against women, their interconnectedness, the risk factors for re-victimisation and the factors affecting the ability and willingness of individuals with different backgrounds to disclose the violence to public authorities. The recommendation on risk assessment and risk management is important for police action.

Police action to prevent offences related to violence against women and domestic violence is governed by several regulations and guidelines. In the summer of 2020, the National Police Board issued more specific guidelines for dealing with incidents of domestic and intimate partner violence and violence against women. Effective from 1 July 2020 to 30 June 2025, the guidelines deal with the role of the police in combating violence against women and domestic violence and include several themes relating to interacting

38 Vuoden 2021 tulossopimus [*Performance Agreement for 2021*]. POL-2020-79684. National Police Board and Police University College.

39 As part of the Action Plan, Victim Support Finland (RIKU) provides a training module on violence against women for police officers, prosecutors, judges and legal counsels in cooperation with the Tampere Settlement Association and the Federation of Mother and Child Homes and Shelters (NAKO project). Information available in Finnish: <https://www.riku.fi/rikosuhripaivystys/koulutukset-tapahtumat-ja-seminaarit/lahisuhdevakivalta/>.

40 MARAC (Multi-Agency Risk Assessment Conference) is a tool to assess the risk of serious intimate partner violence and provide help for victims. Information available in Finnish at: thl.fi/marak (further information on MARAC in Finland available in English at: <https://rikosentorjunta.fi/en/marac>).

with and helping victims. The National Police Board supervises the area of domestic and intimate partner violence and violence against women.

The area is also monitored in connection with the operations of the nationwide police network of victim matters, mediation, guardianship and restraining orders (USEL network), information exchange and maintenance of training material.⁴¹

Police action was further developed in a MARAC project carried out by the National Police Board in 2021 with a view to improving competence among the police and, in particular, among officers working with public order and security. The project was part of the NAPE Committee's activities in 2021. The project carried out a broad assessment of police officers' competence in combating violence against women and domestic violence, established a network of contact persons to help officers working with public order and security tasks to handle incidents of domestic violence, and developed new tools serving practical policing to help both victims and perpetrators of violence and refer them to appropriate services. Furthermore, the project promoted police participation in disseminating the MARAC Multi-Agency Risk Assessment Conference tool in cooperation with the Finnish Institute for Health and Welfare, which coordinates the MARAC work.⁴²

The Action Plan's prevention measures emphasise the gendered nature of violence as a phenomenon and highlight the specificity of violence against women by means such as drawing attention to the gender perspective in more general violence prevention efforts. The measures will complement, as appropriate, other ongoing and planned violence prevention efforts, which are addressed by measures included in other national programmes.

41 Poliisin toiminta perhe- ja lähisuhdeväkivallan sekä naisiin kohdistuvan väkivallan tapauksissa [*Police action in connection with incidents of domestic and intimate partner violence and violence against women*]. Guidelines 11 May 2020. POL-2020-28566.

42 The National Police Board will publish the final report of the MARAC project in 2022.

OBJECTIVE

To increase knowledge and understanding of violence against women and domestic violence and various forms of violence as a social, cultural and structural problem related to gender equality.

When increasing knowledge, attention will be paid to the broad context of violence, such as its effects on the victim's children and other loved ones, and its cultural dimensions, such as its links to narrow gender roles and a culture of violence and substance abuse. When increasing understanding and knowledge, efforts will be made to ensure accessibility for all groups, taking account of the perspective of diversity and equality, and to engage men and boys in recognising the phenomenon and bringing about change. Rationale: GREVIO recommendations No. 1 (Arts. 2 and 3) and No. 11 (Art. 13); Art. 12 obligation

MEASURE	RESPONSIBLE PARTY	SCHEDULE
1.1. Strengthen coordination of communications and cooperation in communications in keeping with the plan objectives.	Ministry of Social Affairs and Health, NAPE Committee (in cooperation with the NGO working group)	2022–2025
1.2. Support inclusion of the perspective of identifying and combating gendered violence in key projects and programmes in cooperation with the parties responsible for these.	NAPE Committee	2022–2025
1.3. Enhance addressing the themes of gender equality, self-determination and consent-based sexual culture as part of migrant-specific services.	Ministry of Economic Affairs and Employment, Finnish Institute for Health and Welfare, Finnish National Agency for Education (in cooperation with NGOs)	2022–2025

OBJECTIVE

To increase information and education on themes relating to violence against women as part of general education and vocational education and training, and in cultural, physical and recreational activities.

Rationale: GREVIO recommendation No. 12 (Art. 14); Article 14 obligation

MEASURE	RESPONSIBLE PARTY	SCHEDULE
1.4. Support the prevention of gendered violence and harassment in publicly funded sports, physical, artistic and cultural activities and in recreational activities.	Ministry of Education and Culture	2022–2025
1.5. Provide training to support the competence of early childhood education and care staff and education and training staff in teaching sexual education and combating gendered violence at all levels of the education system.	Finnish National Agency for Education, Ministry of Education and Culture, Finnish Institute for Health and Welfare (in cooperation with NGOs)	2022–2025
1.6. Consolidate competence in promoting gender equality and non-discrimination within higher education communities.	Ministry of Education and Culture	2022–2023
1.7. Ensure that the Finnish National Agency for Education website on the prevention of bullying, harassment, discrimination and violence also specifically addresses bullying prevention from the perspective of the Istanbul Convention.	Finnish National Agency for Education	2022–2023
1.8. Enhance democracy and human rights education at schools and educational institutions and support increasing the capabilities of teaching staff.	Ministry of Education and Culture	2022–2023

OBJECTIVE

All key professional groups receive training on the different forms of violence against women and how to identify these, gender-sensitive interaction with victims and multiprofessional cooperation both as part of professional training and post-graduation additional training. Rationale: GREVIO recommendation No. 13 (Art. 15), GREVIO recommendation No. 19 (Art. 20)

MEASURE	RESPONSIBLE PARTY	SCHEDULE
1.9. Train early childhood education and care staff and education and training staff on issues of violence against women and domestic violence at the regional level, making use of existing e-learning courses.	Ministry of Education and Culture, Finnish Institute for Health and Welfare	2022–2025
1.10. Consolidate knowledge and competence among public authorities in the different forms of violence against women in broad terms and in practical intersectoral cooperation, increasing joint training, for example.	Ministry of the Interior/National Police Board, Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of Justice/Office of the Prosecutor General, National Courts Administration, Association of Finnish Local and Regional Authorities (in cooperation with NGOs)	2022–2025
1.11. Enhance training provided for healthcare and social welfare staff on issues of violence (online training entitled 'Intervene in violence') and expand online training provision.	Finnish Institute for Health and Welfare	2022–2025
1.12. Encourage higher education institutions to add sexual education to their teacher education curricula.	Ministry of Education and Culture	2022

2.2 Support for victims of violence and services for all parties involved

The Istanbul Convention contains several detailed obligations to assist victims and child witnesses of violence against women. First of all, it requires that services and support measures to prevent further violence be based on a victim-oriented, holistic approach and an understanding of gendered violence. Furthermore, services should be built on efficient cooperation between authorities, and service development should be based on the principle of supporting and empowering victims.

Services for victims of domestic violence and sexual violence have seen positive developments since the Istanbul Convention entered into force in Finland. Following the adoption of what is known as the 'Shelter Services Act'⁴³, funding for shelter services was transferred from local authorities to be covered from central government funds. With the aid of the increase in funding, the shelter network has significantly expanded over recent years, now covering 29 shelters and a total of 211 places for families. As of early February 2022, Seri Support Centres for sexual assault victims had been established in 14 localities, with the intention of extending the network by several additional support centres by 2023⁴⁴. The 24/7 Nollalinja helpline providing services in several languages has operated since 2016 and its operations and services are constantly being developed to meet changing service needs⁴⁵. Launched in 2019, the Barnahus project has played an important role in developing the content and coordination of the support and treatment required by children and families who have experienced violence. The model enhances investigation processes in suspected cases of violence against children and support and treatment for child victims.⁴⁶ As a result of obligations set out in the Istanbul Convention and other international treaties, the regional accessibility of nationwide services for victims of violence has improved significantly over the last few years.

Since violence against women is very rarely brought to the attention of the authorities and as statistics and studies show no decline in the prevalence of domestic and intimate partner violence in particular in recent decades, services for victims of violence will require significant investments in the future as well. GREVIO notes that victims of violence need comprehensive as well as long-term support in order to survive their experiences.

43 Act on Government Compensation to Providers of Shelter Services (1354/2014).

44 See thl.fi/seri (in Finnish).

45 See nollalinja.fi/en.

46 See thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/barnahus-project.

GREVIO encourages Finland to ensure the provision of women-specific services, which are currently provided mainly by NGOs.

In addition to the above-mentioned services for victims of violence, the Istanbul Convention requires basic healthcare and social welfare services to have sufficient expertise and the necessary tools (such as guidelines) to identify, prevent and effectively intervene in all forms of violence against women, giving due consideration for the particular characteristics of experiences of violence among minority groups.

The Ministry of Social Affairs and Health published recommendations for public healthcare and social welfare services for guiding and leading local and regional activities to prevent interpersonal and domestic violence as early as in 2008⁴⁷. Studies conducted in recent years on compliance with the recommendations show that the work to implement the recommendations at the municipal level is still far from complete. Based on a survey carried out in 2019, about half of the municipalities and joint municipal authorities responding to the survey did not, as of the beginning of 2019, have in place a coordination or cooperation group for prevention of interpersonal violence set out in the recommendations. On the other hand, the regions where cooperation structures are in place have also planned client service pathways for intervening in interpersonal violence and set monitoring objectives for preventing interpersonal violence more frequently than other regions.⁴⁸ Amnesty International Finland's municipal survey published in 2021 indicates that awareness of the recommendations for the prevention of interpersonal and domestic violence remains poor in municipalities. Based on the survey, the recommendations are only partially implemented in municipalities and are not reflected as expected in practical implementation.⁴⁹ In recent years, the slow pace of progress in the

47 Recognise, protect and act. Recommendations for the prevention of interpersonal and domestic violence. How to guide and lead local and regional activities in social and health care services. Publications of the Ministry of Social Affairs and Health 2008:9. Available in English (2008:26) at: <http://urn.fi/URN:NBN:fi-fe201504224672>.

48 Nipuli, Suvi. 2019. Lähisuhdeväkivaltaan puuttumisen ja ehkäisyn prosessit [*Report on the processes for intervening in and preventing intimate partner violence*]. Lähisuhdeväkivaltatyön hyvät käytännöt rakenteisiin [*Integrating good practices of intimate partner violence work into structures*]. Publications of the Ministry of Social Affairs and Health 2019:55. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-00-4121-2>.

49 Onko reitti selvä [*Is the coast clear*]? Naisiin kohdistuva väkivalta ja ihmisoikeusvelvoitteiden toteutuminen kunnissa [*Violence against women and realisation of human rights obligations in municipalities*]. Amnestyn seurantatutkimus [*Amnesty follow-up survey*] 2021. Amnesty International Finnish Section. Helsinki 2021. Available in Finnish at: <https://www.amnesty.fi/uploads/2021/05/amnestyn-seurantatutkimus-2021.pdf>.

structures of domestic violence has highlighted the need to consider binding legislation to improve the situation and ensure equal access to services for victims of violence⁵⁰.

One of the challenges raised in the NAPE Committee's survey for its NGO working group was the fact that services are still not available on an equal footing. There are still considerable differences in regional access to services and services should be developed so as to ensure that vulnerable groups, such as people with disabilities, LGBTQI people and migrant women, would also be considered.⁵¹ The responses also raised the importance of women-specific expertise in order to bring the gendered and structural nature of domestic violence more clearly to the fore.

In addition to services provided for victims of violence, the Istanbul Convention also includes an obligation to establish preventive treatment programmes aimed at helping perpetrators of violence to change their attitudes and behaviour. The obligation to establish treatment programmes concerns domestic and sexual violence and the programmes should aim to prevent further violent behaviour. In taking programme measures, the safety of, support for and the human rights of victims should be of primary concern.

In recent years, referral of perpetrators of violence to services has been raised as one of the key areas for improvement within the service system and relevant measures have been included in the Action Plan for Combating Violence against Women coordinated by the Ministry of Justice⁵². Perpetrator services are mainly provided by NGOs. The MARAC

50 The above-mentioned 2021 Amnesty follow-up survey and Publications of the Ministry of Social Affairs and Health 2019:55. The Finnish Institute for Health and Welfare is currently preparing an update to the 2008 recommendations, bearing in mind the ongoing reform of healthcare and social welfare. The new recommendations are to be published during 2022.

51 The weak situation of high-risk groups in violence prevention services is also highlighted in the report of the Ministry of Social Affairs and Health (Publications of the Ministry of Social Affairs and Health 2019:55). According to the report, women with disabilities, LGBTQI minorities, asylum-seeking women and those who do not speak much Finnish are at specific risk of being excluded from services suitable for them.

52 Services for perpetrators were highlighted as one of the areas for improvement by many NGOs in responses to the survey carried out for the NAPE Committee's NGO working group. The Action Plan for Combating Violence against Women for 2020–2023 channels discretionary government grants into action plans addressing sexual and violent crimes and is drafting qualitative criteria for those to be funded and a modelling framework for service coordination ([project of the Federation of Mother and Child Homes and Shelters for 2020–2023, entitled 'Onto a safe track'](#)). The Action Plan also examines Nordic programmes for perpetrators and their suitability for working with perpetrators of domestic violence in prisons.

project⁵³ carried out by the National Police Board in 2021 highlighted the fact that the efforts of public healthcare and social welfare services and NGOs to assist both victims and perpetrators of violence play an important role in preventing violence. The key areas for improvement raised in the project included ensuring nationwide access to services for perpetrators and increasing the visibility of work carried out with perpetrators.

GREVIO urges Finland to make many changes in order to develop services for victims and child witnesses of violence. Its recommendations oblige public authorities to take, among other actions, appropriate measures to set up multiprofessional structures for the prevention of violence based on comprehensive cooperation. As part of such structures, GREVIO recommends developing guidelines necessary to support cooperation for all forms of violence against women. Furthermore, GREVIO notes that the NGOs providing services for victims of violence form a key part of permanent structures of violence prevention and expects that the specialist services mainly provided by NGOs be secured in order to support victims' survival, also taking account of their needs for long-term support.

The Action Plan covers many measures aimed at responding to GREVIO recommendations for the development of services. The measures take account of the ongoing healthcare and social welfare reform, which will also have a significant impact on the types of structures and services that will be offered to victims of violence against women and domestic violence and other parties involved, and the extent to which the equal availability and accessibility of services will be realised in the future.

Wherever possible, efforts have been made to ensure that the measures concerning services also take account of the ongoing measures included in other programmes that have interfaces with support services for victims of violence against women and domestic violence. By way of example, the measures launched during the period covered by the first Action Plan for the Istanbul Convention included those aimed at increasing access to shelter services for victims of violence with disabilities, those from the Roma community and those with substance abuse issues.

Support for children who have experienced sexual violence and witnessed domestic violence has been taken comprehensively into account in the 'Non-Violent Childhoods' action plan, the National Action Plan for the Lanzarote Convention and as part of Barnahus project activities. In order to avoid overlaps, this plan does not include a comprehensive range of measures concerning prevention of gendered and sexual violence against underage individuals, including children, and support services for victims.

53 The final report of the MARAC project carried out by the National Police Board will be published in 2022.

OBJECTIVES

To ensure the establishment of multi-agency structures for preventing violence (intersectoral coordination, guidelines, service pathways, dissemination of effective models) on a permanent basis at the national level, in wellbeing services counties and municipalities. Rationale: GREVIO recommendation No. 17 (Art. 18)

To expand provision of and improve access to violence prevention services under the responsibility of the central government, wellbeing services counties and municipalities; to ensure access to services by vulnerable victims and equal accessibility of violence prevention services nationwide. Rationale: GREVIO recommendations No. 17 (Art. 18), No. 18 and No. 19 (Art. 20)

To strengthen and increase services for perpetrators of violence and individuals recognising violent behaviour in themselves as part of restructuring healthcare and social welfare services while ensuring equal access to services nationwide. Rationale: Article 16

MEASURE	RESPONSIBLE PARTY	SCHEDULE
2.1. Support violence prevention structures as part of the healthcare and social welfare reform and multi-agency cooperation (incl. NGOs).	Finnish Institute for Health and Welfare, Ministry of Social Affairs and Health, Ministry of the Interior/ National Police Board, NAPE Committee, Association of Finnish Local and Regional Authorities	2022–2025
2.2 Continue development of service pathways to refer clients from other services to shelters and, vice versa, to refer clients to further services as needed after a shelter period.	Finnish Institute for Health and Welfare (in cooperation with NGOs)	2022–2025
2.3. Enhance access to violence prevention services by increasing awareness of the services in different languages (incl. the Sámi languages, sign language).	Finnish Institute for Health and Welfare	2022–2025
2.4. Improve identification of exposure to violence in mental and substance abuse services and support client-oriented coordination of services.	Finnish Institute for Health and Welfare, Ministry of Social Affairs and Health	2022–2025

MEASURE	RESPONSIBLE PARTY	SCHEDULE
2.5 Explore the development of nationwide service packages for perpetrators of violence on the basis of the national model and quality criteria for service coordination.	Finnish Institute for Health and Welfare, Ministry of Social Affairs and Health, Ministry of Justice/Criminal Sanctions Agency, Ministry of the Interior/National Police Board (in cooperation with NGOs)	2022–2025

OBJECTIVE

To strengthen the network of specialist services for victims of violence against women and domestic violence and ensure the gender and cultural sensitivity of the services. Rationale: GREVIO recommendations Nos. 20–23 (Arts. 22, 23, 24, 25)

MEASURE	RESPONSIBLE PARTY	SCHEDULE
2.6. Develop the Nollalinja helpline operations to consolidate the chat service and expand the range of languages available.	Finnish Institute for Health and Welfare	2022–2025
2.7. Develop the shelter network with particular attention to regional access to services and vulnerable groups.	Ministry of Social Affairs and Health, Finnish Institute for Health and Welfare	2022–2025
2.8. Enhance access to assistance, support and treatment for individuals who have experienced honour-related violence or undergone FGM, as part of the current healthcare and social welfare system.	Finnish Institute for Health and Welfare, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment	2022–2025
2.9. Expand the network of Seri Support Centres for sexual assault victims to cover the entire country by the end of 2023, ensuring its coordination and the provision of psychosocial support by Seri Support Centres.	Ministry of Social Affairs and Health, Finnish Institute for Health and Welfare	2022–2025

2.3 Preventing further violence and enforcing criminal accountability

This section deals with the obligations set out in the Istanbul Convention for the development and monitoring of legislation relevant to the scope of the Convention and for support for victims during criminal proceedings, on the one hand, and prevention of further violence and promotion of the enforcement of criminal accountability, on the other. The section also covers measures aimed at taking account of the best interests and needs of child witnesses of violence.

The Istanbul Convention contains several provisions on investigation, prosecution, procedural law and protective measures. These require, for example, the precedence of the rights of victims in pre-trial investigations and during criminal proceedings and understanding of gender-based violence. All cases of violence against women must also be investigated effectively, avoiding undue delay at all stages of investigations and criminal proceedings.⁵⁴

In its report on Finland, GREVIO expressed its concern for the fact that only a small percentage of cases of violence against women lead to criminal proceedings, while the number of cases resulting in a conviction is even smaller.

GREVIO focuses particular attention on non-prosecution of offences involving domestic violence and sexual violence, encouraging the authorities to take all practicable steps to increase the number of convictions in cases of domestic and sexual violence.

Recent research⁵⁵ indicates that much more remains to be done to ensure the rights of victims of sexual violence and rape in criminal proceedings. The strict interpretation and application of the provisions on rape and the high evidentiary threshold contribute to the attrition of criminal proceedings. The closure of investigations and non-prosecution

54 Törmä, Sinikka ja Pentikäinen, Merja: Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi – Naisiin kohdistuvan väkivallan vähentämisen ohjelmasta Istanbulin sopimuksen toimeenpanoon [*Towards a Finland Free of Violence against Women and Domestic Violence – From the Action Plan to Reduce Violence against Women to the implementation of the Istanbul Convention*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2016:15. Available in Finnish at: <http://urn.fi/URN:ISBN:978-952-00-3707-9>.

55 Alaattinoğlu, Daniela & Kainulainen, Heini & Niemi, Johanna. 2020. Raiskausrikosten eteneminen rikosprosessissa [*The Progress of Rape Offences in the Finnish Criminal Process*]. Research papers and reports of the Faculty of Law 1/2020; Fighting the lottery – Overcoming barriers to justice for women rape survivors in Finland. Amnesty International Finnish Section 6 March 2019.

of sexual and rape offences are often influenced by the lack of understanding among the authorities of sexual violence and its effects on the victim's behaviour. In addition to the remarkably long duration of court proceedings on many cases of sexual offences, many victims experience inappropriate and judgmental treatment by the authorities, which may make them want to withdraw from the criminal proceedings.

The legal and other counselling and personal support provided for victims play a significant role in the realisation of victims' rights during pre-trial investigations and criminal proceedings. The rights and status of crime victims have been strengthened in legislation as a result of the implementation of the EU Victims' Directive (2012/29/EU), for example. The Directive includes an obligation to carry out an individual assessment of the vulnerability of the victim's standing and to respond to the needs of the victim⁵⁶.

The Action Plan for Combating Violence against Women coordinated by the Ministry of Justice contains several measures to develop competence, aiming to respond to GREVIO's requirements with regard to the authorities involved in criminal proceedings and those working in prison and probation services in particular. To build on the measures concerning training of authorities involved in criminal proceedings and prison and probation services, the Action Plan for the Istanbul Convention includes a measure to promote the provision of legal counselling and support in services intended for victims and to consolidate professional practices in order to ensure support for victims during pre-trial investigations and criminal proceedings.

Recurrence is typical of domestic and intimate partner violence. According to a 2021 survey of the Finnish Institute for Health and Welfare, pre-trial investigation data indicates that 80% of intimate relationships resulting in homicide had involved prior incidents of violence, often for quite some time.

Likewise, intimate partner violence experienced by shelter clients had lasted long before their entry into a shelter: exposure to violence had lasted for one to five years among about a third and for more than five years among 24% of clients⁵⁷.

56 The Ministry of Justice has imposed a public service obligation to provide general support services for crime victims as part of the operations of Victim Support Finland (RIKU) for the period from 2018 to 2027. Victim Support Finland offers support and counselling in matters which are also relevant to the realisation of the rights of victims during criminal proceedings.

57 Tilastoraportti [*Statistical Reports*] 17/2021. Turvakotipalvelut [*Shelters for victims of domestic violence*] 2020. Finnish Institute for Health and Welfare. Available in Finnish (English summary) at: https://www.julkari.fi/bitstream/handle/10024/142646/Tilastoraportti%202020%2028.5.2021_FINAL.pdf.

The Istanbul Convention obliges the authorities to carry out assessments of the risk of violence and lethality and to manage risk through coordinated measures. Finland's national response to this obligation involves nationwide dissemination of the Multi-Agency Risk Assessment Conference, i.e. the MARAC tool. MARAC is a multi-agency tool developed to improve assessment of the risk of serious intimate partner violence and the safety of victims, which is in relatively widespread use. The MARAC tool was introduced in Finland in 2010 and the activities are coordinated at the national level by the Finnish Institute for Health and Welfare. At the end of 2021, 39 local conferences were operating in Finland.

Expanding the use of the MARAC tool and other risk assessment methods and their evaluation will be continued and supported through measures included in the Action Plan.

The Action Plan also responds to the need to prevent serious domestic violence and lethal intimate partner violence by a measure aiming to develop a monitoring system for domestic homicides. In Europe, a similar system is in place in Sweden, Ireland, England and Wales, for example.⁵⁸

The current government term has seen the launch of several legislative projects and reviews which are relevant to the scope of the Istanbul Convention and also respond to the recommendations presented to Finland by GREVIO. In addition to the comprehensive reform of legislation governing sexual offences, the Ministry of Justice is currently reviewing legislation related to female genital mutilation and forced marriage, the efficacy of restraining orders in incidents of domestic violence and the continued use of mediation in cases of intimate partner violence.

As part of the Action Plan for Combating Violence against Women, the Ministry of Justice will carry out a legal analysis of the criminalisation of coercive control/psychological violence in 2022, including the effectiveness of legislation on stalking⁵⁹.

58 A report on the domestic homicide review procedure will be published in 2022 as part of the Research Reports series of the Police University College. Rowlands, J. 2019. Reviewing domestic homicide. International practice and perspectives. Project report Winston Churchill Memorial Trust. Available at: <http://sro.sussex.ac.uk/id/eprint/92181/3/James%20Rowlands%20Churchill%20Fellowship%20Report%20%28final%20for%20publication%29.pdf>; Swedish National Board of Health and Welfare. 2022. Socialstyrelsens utredningar av vissa skador och dödsfall [*Investigations by the Swedish National Board of Health and Welfare of certain injuries and deaths*] 2018–2021. Available in Swedish at: <https://www.socialstyrelsen.se/globalassets/sharepoint-dokument/artikelkatalog/ovrigt/2022-1-7738.pdf>.

59 Publications of the Ministry of Justice. Memorandums and statements 2020:15. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-835-6>.

The Action Plan includes a legislative measure aimed at monitoring the ongoing legislative projects relevant to the scope of the Istanbul Convention while also assessing, where possible, the practical application of such legislation.

The Istanbul Convention takes account of the particular vulnerability of migrant women and includes specific obligations to ensure the rights of asylum seekers and women from migrant backgrounds who have experienced violence, irrespective of residence status. By way of example, the Convention requires that migrant women who have left a violent relationship be able to apply for an autonomous residence permit not dependent on the residence status of the spouse or partner.

In its country report on Finland, GREVIO raised concerns about the overrepresentation of women from migrant backgrounds as victims of violence against women, which is reflected in aspects such as the use of shelter services. Consequently, GREVIO urges Finland to ensure that fear of deportation does not prevent migrant women from leaving abusive spouses, regardless of whether they have children. This should be done by means such as informing newly arrived migrant women of this right, increasing trauma expertise among the authorities and removing excessively high evidentiary thresholds for applications for extended residence permits. Furthermore, GREVIO draws attention to the fact that no statistical data is available on applications where domestic violence was used as the basis for the residence permit process.

Responses to the survey sent to the NAPE Committee's NGO working group raised concerns about the realisation of the legal protection of migrant women in service structures following the demographic changes that have taken place in Finland during the 21st century. Both the NGO survey and the workshops organised by the NAPE Committee highlighted reliable and professional interpreting services as a prerequisite for realisation of the rights of victims of violence whose language is not one of the major world languages.

OBJECTIVES

To enhance the implementation and monitoring of official obligations and guidelines concerning the protection of victims of violence against women and domestic violence and the coordination of services, paying particular attention to the review of mediation in cases of intimate partner violence, the evaluation of the realisation of the risk assessment obligation and the systematic assessment of lethal risk based on research.

Rationale: GREVIO recommendations No. 36 (Art. 48); No. 37 (Art. 50); No. 39 (Art. 51); No. 40 (Arts. 52 and 53)

To ensure that migrant women have the chance to obtain an independent residence permit after leaving a violent relationship and relevant, timely information about their rights.

Rationale: GREVIO recommendations Nos. 44 and 45 (Art. 59)

To ensure that victims receive timely legal aid and other legal support and counselling as part of provision of services for victims of violence, particularly during criminal investigations and court proceedings.

Rationale: GREVIO recommendations No. 41 (Art. 55) and No. 42 (Art. 57)

MEASURE	RESPONSIBLE PARTY	SCHEDULE
3.1. Launch a permanent domestic homicide review procedure to enhance assessment of the risk of domestic violence and prevent serious offences against women.	Ministry of the Interior/National Police Board, Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of Justice	2022–2025
3.2. Promote the conduct of systematic risk assessments, paying attention to multiprofessional cooperation.	Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of the Interior/National Police Board	2022–2025
3.3. Promote the implementation of service coordination by the authorities for both victims and perpetrators of violence.	Ministry of the Interior/National Police Board, Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare	2022–2025

MEASURE	RESPONSIBLE PARTY	SCHEDULE
3.4. Produce a background study on residence permit applications filed and residence permits granted by virtue of the Aliens Act (301/2004, section 54, subsection 7) in cases related to domestic violence and the practical application of the Act with a view to building up the knowledge base.	Ministry of the Interior/Finnish Immigration Service	2022–2025
3.5. Promote the provision of legal counselling and support in services available to victims and consolidate professional practices in order to ensure support for victims during pre-trial investigations and criminal proceedings.	Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of the Interior/National Police Board, Ministry of Justice/Office of the Prosecutor General (in cooperation with NGOs)	2022–2025
3.6. Monitor the implementation of key legislative projects relevant to the scope of the Istanbul Convention and examine legislative development needs, paying particular attention to GREVIO recommendations and international developments in legislation.	NAPE Committee, Ministry of Justice	2022–2025
<i>Psychological violence and coercive control</i>		
• GREVIO recommendation (Article 33)		
<i>Stalking</i>		
• GREVIO recommendation (Article 34)		
<i>Comprehensive reform of legislation governing sexual offences</i>		
• GREVIO recommendation (Article 36)		
<i>Forced marriage</i>		
• GREVIO recommendation (Art. 37)		
<i>Female genital mutilation</i>		
• GREVIO recommendation (Article 38)		
<i>Mediation in cases of intimate partner violence</i>		
• GREVIO recommendation (Article 48)		
<i>Restraining orders</i>		
• GREVIO recommendation (Articles 52 and 53)		

The Istanbul Convention contains several obligations for protecting children and young people from violence. The status of children and the consequences of violence on children should be taken into account in preventive measures, such as information campaigns for prevention of violence. The Convention imposes an obligation to take the best interests

and needs of children into account, not only as victims of the forms of violence covered by its scope, but also as witnesses of violence. Article 26 of the Convention expressly obliges the Parties to ensure that child witnesses of violence against women or domestic violence receive age-appropriate psychosocial support adjusted to their level of maturity in order to cope with their experience. The status and needs of children should be taken into account as part of the whole context of incidents of domestic violence. By way of example, the range of services (such as shelters and community-based services) should be developed taking due account of the needs and rights of children as well as adults.

GREVIO urges Finland to ensure that, when determining custody and visitation rights, courts will also consider violence in the family and the detrimental nature of exposure to violence even in situations where children themselves are not its direct targets.

A safety project carried out by the Federation of Mother and Child Homes and Shelters in 2019–2022 has developed and tested a child-oriented risk assessment model in particularly difficult divorce situations⁶⁰. The Barnahus project⁶¹ has also advanced the debate and increased professionals' awareness of the detrimental effects of witnessing domestic violence on children's growth and development and its consequences to behaviours in adulthood. A handbook published in early 2022, providing guidance on how to draw up social welfare board reports for court proceedings required under the Act on Child Custody and Right of Access (361/1983, the 'Child Custody Act'), instructs readers also to take violence in the family and its detrimental consequences for children into account in the report⁶².

60 The project has produced the following handbook for demanding divorce counselling for healthcare and social welfare professionals: Vaitomaa, Muukkonen & Rautio (eds.) 2021. *Vaativan erotyön käsikirja [Handbook for demanding divorce counselling]*. Federation of Mother and Child Homes and Shelters. Available in Finnish at: https://issuu.com/ensi-jaturvakotienliitto/docs/digi_etl_vaativa_erotyo_2021_sivuttain.

61 The Barnahus project organised a webinar on children as witnesses of violence together with the NAPE Committee on 12 October 2021 (information in Finnish at <https://thl.fi/fi/ajankohtaista/tapahtumat/tapahtumakalenteri/-/event/7494467>). Read more about the Barnahus project in English at: thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/barnahus-project.

62 October, Martta & Tervo, Jaana (eds.): *Opas lapsenhuoltolain mukaisen selvityksen laatimiseksi [Handbook for drawing up reports under the Child Custody Act]*. Recommendation by a group of experts. Directions 2/2021. Finnish Institute for Health and Welfare, Helsinki. Available in Finnish at: https://www.julkari.fi/bitstream/handle/10024/143747/URN_ISBN_978-952-343-733-3.pdf.

OBJECTIVES

To take the rights of child witnesses of domestic violence and the best interests of children into account in all decision-making processes concerning them. Rationale: GREVIO recommendation No. 26 (Art. 31); Article 18

To guarantee the rights of children exposed to violence and the best interests of children during criminal investigations and court proceedings. Rationale: Art. 56, para. 2

MEASURE	RESPONSIBLE PARTY	SCHEDULE
3.7. Train social welfare professionals to draw up reports on circumstances on the basis of the national guidelines by the Finnish Institute for Health and Welfare.	Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of Justice	2022–2023
3.8. Consolidate practices to ensure that child witnesses of domestic or intimate partner violence receive support and protection during criminal investigations and court proceedings concerning violence.	Ministry of the Interior/National Police Board, Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of Justice (in cooperation with NGOs)	2022–2025

2.4 Coordination of measures and data collection

The key principle enshrined in the Istanbul Convention is built on the idea of the necessity of comprehensive and coordinated policies in order to effectively combat and prevent violence against women and domestic violence. A holistic approach requires giving precedence to the rights of victims and organising operations such that multidisciplinary cooperation between different actors is built on jointly agreed rules and guidelines. Establishing national structures to enable cooperation and securing appropriate financial and human resources allocated for this purpose form a key part of implementing this obligation.

The Istanbul Convention imposes an obligation to take the role of NGOs into account as part of official national or regional structures for cooperation in preventing violence and to allocate the necessary financial resources to them. NGOs have played a key role in promoting action against violence against women and developing services for victims

for years. Despite the stronger role assumed by public authorities in organising and coordinating services provided for victims of violence in recent years, NGOs are still largely responsible for organising and providing support services for victims. For instance, NGOs offer many low-threshold, crisis, preventive and outreach services, and services in support of the survival stage. They also play an important role in providing services for vulnerable groups. The COVID-19 pandemic has increased demand for violence prevention services offered by NGOs.

NGOs have raised concerns for the continuity and adequacy of services. A new funding model is being developed to replace the grants based on the gambling proceeds of Veikkaus Oy, a wholly state-owned limited liability company, which used to be distributed by the Funding Centre for Social Welfare and Health Organisations attached to the Ministry of Social Affairs and Health. On the proposal of the Prime Minister, the Government set up a fixed-term project to draw up a proposal for a new model for funding the activities previously funded from gambling proceeds.⁶³

GREVIO encourages Finland to enhance cooperation with NGOs and ensure their role in planning national policies and programmes and in the structures for preventing violence.

In many regions, NGOs cooperate closely with local authorities and service providers and this cooperation has produced effective operating models for assisting victims of violence⁶⁴. However, GREVIO has noted that Finland does not have any formal guidance that would oblige authorities to take the role of NGOs into account as partners in official violence prevention structures.

National action plans drawn up to prevent violence against women and domestic violence are key tools for coordinating measures and policies. The Action Plan to Reduce Violence

63 Rahapelituotoilla tuetuille toimijoille aletaan valmistella korvaavaa rahoitusmallia [*Preparations to be started for a substitute funding model for actors supported through gambling proceeds*] – press release from the Prime Minister's Office (available in Finnish at vnk.fi); Yhteisymmärrysmuistio (VNK) [*Memorandum of Understanding (Prime Minister's Office)*] 8 February 2022: [Rahapelituotoilla rahoitettavien yleishyödyllisten toimintojen uusi rahoitusmalli](#) [*New funding model for non-profit activities funded through gambling proceeds*].

64 An example of effective cooperation is an association called VIOLA – Free from Violence, which operates a community service unit for domestic and intimate partner violence in the South Savo region. VIOLA offers services for perpetrators and victims of violence on a low-threshold principle. The association cooperates with a wide range of regional authorities and NGOs in modelling coordinated service pathways, MARAC activities, providing key personnel training and within a regional coordination group for violence prevention work. Further information: [Viola – Free from Violence Association](#), [Mikkeli – Apuaeroon.fi](#) divorce help site.

against Women for 2010–2015 was the first intersectoral action plan based on a holistic approach. The Action Plan for the Istanbul Convention for 2018–2021 and its continuation in the second plan for 2022–2025 aim to carry on the comprehensive efforts to combat violence against women and domestic violence. Coinciding with the terms of the two Action Plans for the Istanbul Convention, the Action Plan for Combating Violence against Women coordinated by the Ministry of Justice was drawn up in intersectoral cooperation, choosing to include themes and areas that other national action plans had not addressed broadly or at all.

Intersectoral cooperation and coordination of measures has been enhanced by the establishment in 2017 of the Committee for Combating Violence against Women and Domestic Violence, or the NAPE Committee for short. As an intersectoral body, the NAPE Committee is also responsible for coordinating and monitoring measures to implement the Istanbul Convention. In recent years, the NAPE Committee has received resources for its operations that have allowed it to employ a full-time General Secretary, among other things. This has enabled the Committee to develop its work with a more long-term view in line with the obligations included in Article 10 of the Istanbul Convention.

Based on Prime Minister Sanna Marin's Government Programme, Parliament adopted the Government's proposal to establish a position of the rapporteur for violence against women (Government Proposal HE 123/2021) at the end of 2021. In keeping with the proposal, working as the rapporteur for violence against women was added to the duties of the Ombudsman for Equality. The rapporteur monitors violence against women and domestic violence, the effectiveness of national legislation and the fulfilment of international obligations widely across sectoral boundaries. As the rapporteur for violence against women, the Ombudsman for Equality also monitors and evaluates the policies and measures for preventing and combating the forms of violence covered by the scope of the Istanbul Convention.

As a result of the establishment of the rapporteur's position, the Decree governing the NAPE Committee was amended, as both the NAPE Committee and the Ombudsman for Equality are currently carrying out the duties required under Article 10 of the Istanbul Convention⁶⁵. During the NAPE Committee's current four-year term, the Ombudsman for Equality functions as its permanent expert and cooperation with the rapporteur has been raised as one of the measures in this Action Plan.

⁶⁵ Government Decree amending section 1 of the Government Decree on the Committee for Combating Violence against Women and Domestic Violence (1078/2021).

Effective prevention of violence against women and domestic violence depends on evidence-based measures, models and practices. The Istanbul Convention requires the Parties to collect disaggregated relevant statistical data at regular intervals on cases of all forms of violence covered by the scope of the Convention. The Convention also requires the Parties to conduct population-based surveys at regular intervals to assess the prevalence of and trends in all forms of violence covered by its scope. The Convention further imposes an obligation to support research in the field of all forms of violence covered by its scope in order to obtain information on the root causes and effects of violence, incidences and conviction rates and the efficacy of measures taken to implement the Convention.⁶⁶

Research into violence against women and domestic violence and systematic collection of statistical data has been promoted in many ways in recent years. The measures launched during the term of the first Action Plan for the Istanbul Convention, running through to 2021, included studies on the costs of domestic violence and on domestic violence against people with disabilities. In addition, several other studies and projects relating to domestic violence and sexual violence were initiated as part of the Government's analysis, assessment and research activities.⁶⁷

66 Törmä, Sinikka ja Pentikäinen, Merja: Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi – Naisiin kohdistuvan väkivallan vähentämisen ohjelmasta Istanbulin sopimuksen toimeenpanoon [*Towards a Finland Free of Violence against Women and Domestic Violence – From the Action Plan to Reduce Violence against Women to the implementation of the Istanbul Convention*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2016:15. Available in Finnish at: <http://urn.fi/URN:ISBN:978-952-00-3707-9>.

67 Tapahtumaketjut naisiin kohdistuvissa parisuhdetapoissa [*Examining the chains of events leading to intimate partner homicide against women*] (information available in Finnish at: <https://tietokayttoon.fi/-/tapahtumaketjut-naisiin-kohdistuvissa-parisuhdetapoissa>); Lähisuhdeväkivallasta aiheutuvat kustannukset Suomessa (LAKU) [*Costs of domestic violence in Finland (LAKU)*] (information available in English at: <https://thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/costs-of-domestic-violence-in-finland-laku->); Vammaisten henkilöiden kokeman lähisuhdeväkivallan yleisyys ja palvelujen saatavuus – määrällinen ja laadullinen tarkastelu [*Frequency of domestic violence experienced by persons with disabilities and availability of services – a quantitative and qualitative examination*] (information available in English at: <https://thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/frequency-of-domestic-violence-experienced-by-disabled-persons-and-availability-of-services-a-quantitative-and-qualitative-examination>); Seri-tukikeskusten asiakkaiden tausta, tukipalveluiden käyttö ja rikosprosessin eteneminen [*The background of the clients in Seri Support Centres, their use of support services and the progress of the criminal procedure*] (information available in Finnish at: <https://tietokayttoon.fi/-/seri-tukikeskusten-asiakkaiden-tausta-tukipalveluiden-kaytto-ja-rikosprosessin-eteneminen>).

NGOs have also commissioned many studies and surveys on the prevalence of different forms of violence, service needs and the efficacy of anti-violence measures⁶⁸.

Efforts made to respond to the obligation of systematic and comprehensive collection of statistical data set out in the Istanbul Convention and to the recommendations by GREVIO include taking violence against women and, in particular, domestic violence into account in developing the information systems of the law-enforcement and judicial authorities, within the 'VITJA' and 'AIPA' projects. Efforts have also been made to enhance systematic data collection in the information systems of healthcare and social welfare authorities by promoting the systematic use of a specific structured document (Domestic violence enquiry and assessment form) in the National Archive for Health Information known as 'Kanta Services' and monitoring the frequency of its use and the prevalence of the reported phenomenon through entries in Kanta Services. Measures relating to data collection by authorities were already included in the first Action Plan for the Istanbul Convention and measures to continue this work are also included in this Action Plan.

68 E.g. Hansen, Sams, Jäppinen & Latvala. 2016. *Kunniakäsitykset ja väkivalta [Concepts of honour and violence]*. Selvitys kunniaan liittyvästä väkivallasta ja siihen puuttumisesta Suomessa [A report on honour-related violence and the addressing of it in Finland]. Finnish League for Human Rights. Available in Finnish (English summary) at: https://ihmisoikeusliitto.fi/wp-content/uploads/2016/06/Kunniak%C3%A4sitykset-ja-v%C3%A4kivalta_B5_netiti-002.pdf; Mohamed & Latvala. 2020. FGM – Awareness and perceptions of Somali men in the Helsinki region, Finland. Finnish League for Human Rights. Available in English at: (<https://ihmisoikeusliitto.fi/wp-content/uploads/2020/09/FGM-Awareness-and-perceptions-of-Somali-men-in-the-Helsinki-region.pdf>); Mari Lakeus & Laura Keskinen. 2021. *Verkossa satutetut [Hurt online]*. Selvitys naisiin ja sukupuolivähemmistöihin kohdistuvan verkkohäirinnän seurauksista [A study on the consequences of online harassment against women and LGBTQI minorities]. The report was produced as part of the S@fety Net project of the National Women's Line in Finland, 2021 (available in Finnish at: https://assets.ctfassets.net/pbxhiiewat8h/77ZBbcKYCsv2YfLeI5Axn2/6aab09d758fd0bacaf33bba34c69a28e/Verkossa_satutetut_raportti.pdf).

OBJECTIVES

To enhance intersectoral and multidisciplinary coordination in the implementation of the Istanbul Convention and in monitoring and assessment of the measures in all areas of the Action Plan. Rationale: GREVIO recommendations Nos. 3–6 (Arts. 7–10)

To support and coordinate compilation of disaggregated statistics and research into all forms of violence covered by the scope of the Istanbul Convention, while also taking account of the conditions for multidisciplinary cooperation. Rationale: GREVIO recommendations Nos. 7–10 (Art. 11)

MEASURE	RESPONSIBLE PARTY	SCHEDULE
4.1. Cooperate with the rapporteur for violence against women in monitoring and assessing the implementation of the Istanbul Convention.	NAPE Committee	2022–2025
4.2. Develop a monitoring mechanism for the Action Plan for the Istanbul Convention.	NAPE Committee	2022
4.3. Promote systematic collection of data on the needs for support or assistance relating to violence in the information systems of healthcare and social welfare authorities.	Finnish Institute for Health and Welfare	2022–2025
4.4. Promote systematic collection of data on violence against women and domestic violence in the information systems of law-enforcement and judicial authorities (VITJA and AIPA projects).	Ministry of the Interior/National Police Board, Office of the Prosecutor General, National Courts Administration	2022–2023
4.5. Promote the operating conditions of NGO-driven assistance work and recognition of NGOs as part of development of multiprofessional cooperation.	NAPE Committee, Ministry of Social Affairs and Health, Ministry of Justice, Ministry of the Interior, Ministry of Economic Affairs and Employment	2022–2025
4.6. Supplement the existing guidelines on the rights to access information for professionals involved in violence prevention work in order to promote multidisciplinary cooperation, and examine potential legislative development needs in terms of the rights of access to information.	Ministry of Social Affairs and Health/Finnish Institute for Health and Welfare, Ministry of the Interior/National Police Board, Ministry of Justice, Ministry of Education and Culture	2022–2025

MEASURE	RESPONSIBLE PARTY	SCHEDULE
<p>4.7. Support publicly funded research (incl. the Government's analysis, assessment and research activities) into the themes required by GREVIO and other subjects, including:</p> <ul style="list-style-type: none"> • violence experienced by migrant women and those from migrant backgrounds and its prevalence; • development needs of violence prevention services from the perspective of vulnerable individuals; • effects of witnessing domestic violence on children; • effectiveness and efficacy of protective measures; • review of risk assessment methods. 	<p>Ministry of Social Affairs and Health, Ministry of Justice, Ministry of the Interior, Ministry of Economic Affairs and Employment, Ministry of Education and Culture, Ministry for Foreign Affairs, NAPE Committee</p>	<p>2022–2025</p>

Appendix 1 Composition of the NAPE Committee and its NGO working group

Committee for combating violence against women and domestic violence (NAPE) during the term from 21 January 2021 to 20 January 2025

Chairperson:

Päivi Sillanaukee, Senior Adviser, Ministry for Foreign Affairs

Deputy Chairperson:

Jari Keinänen, Director, Ministry of Social Affairs and Health

Members (deputies in parentheses):

Satu Sistonen, Legal Counsellor, Ministry for Foreign Affairs

(Kaisa Leidy, Counsellor, Ministry for Foreign Affairs)

Minna Piispa, Ministerial Adviser, Ministry of Justice

(Elina Ruuskanen, Ministerial Adviser, Ministry of Justice)

Kimmo Halme, Chief Superintendent, Ministry of the Interior

(Heidi Kankainen, Ministerial Adviser, Ministry of the Interior)

Virpi Vuorinen, Budget Counsellor, Ministry of Finance

(Outi Luoma-aho, Budget Counsellor, Ministry of Finance)

Petra Heikkinen, Specialist, Ministry of Education and Culture

(Kirsi Alila, Senior Ministerial Adviser, Ministry of Education and Culture)

Varpu Taarna, Senior Specialist, Ministry of Economic Affairs and Employment

(Anna Bruun, Ministerial Adviser, Ministry of Economic Affairs and Employment)

Minna Viuhko, Senior Specialist, Ministry of Social Affairs and Health

(Pirjo Lillsunde, Ministerial Adviser, Ministry of Social Affairs and Health)

Pekka Heikkinen, Chief Superintendent, National Police Board

(Måns Enqvist, Chief Superintendent, National Police Board)

Satu Honkala, Counsellor of Education, Finnish National Agency for Education

(Kati Costiander, Counsellor of Education, Finnish National Agency for Education)

Minna Malviniemi, Senior Officer, National Supervisory Authority for Welfare and Health

(Lilli Autti, Senior Officer, National Supervisory Authority for Welfare and Health)

Martta Ochober, Development Manager, Finnish Institute for Health and Welfare

(Elisa Niklander, Senior Specialist, Finnish Institute for Health and Welfare)

Maria Salenius, Senior Adviser, Association of Finnish Local and Regional Authorities

(Tarja Tenkula, Senior Adviser, Association of Finnish Local and Regional Authorities)

Pekka Hänninen, Senior Statistician, Statistics Finland

(Marjut Pietiläinen, Senior Researcher, Statistics Finland)

Peter Levlin, Senior Specialist Prosecutor, Office of the Prosecutor General

(Pia Mäenpää, Senior Specialist Prosecutor, Office of the Prosecutor General)

Venla Roth, Ministerial Adviser, Ministry of Justice Tiina Muukkonen,

Development Manager, Federation of Mother and Child Homes and Shelters

(Sanna Leppäjoki-Tiistola, Organisation Specialist, Finnish Association of People with Physical Disabilities)

Secretary:

Taina Riski, Senior Specialist, Finnish Institute for Health and Welfare

Permanent experts:

Leena Leikas, Human Rights Centre

Marjo Rantala, Office of the Ombudsman for Equality

Kristina Stenman, Ombudsman for Equality

Päivi Yli-Pietilä, Ministry of Social Affairs and Health, Gender Equality Unit

NGO working committee during the term from 23 September 2020 to 31 December 2024

Chairperson:

Minna Viuhko, Ministry of Social Affairs and Health

Members (deputies in parentheses):

Amnesty International Finnish Section: Pia Puu Oksanen (Niina Laajapuro)

Federation of Mother and Child Homes and Shelters: Tiina Muukkonen (Sari Laaksonen)

Exit Prostitution Association/Youth Exit: Laura Rapo (Anniina Piironen)

Finnish League for Human Rights: Johanna Latvala (Solomie Teshome)

Finnish Association of People with Physical Disabilities (network of women members of associations for people with disabilities): Sanna Leppäjoki-Tiistola (Jaana Tiiri)

Association of Finnish Local and Regional Authorities: Maria Salenius (Tarja Tenkula)

Loisto Settlement Association/Boys' House: Veli-Pekka Kilpala

Loisto Settlement Association/Girls' House: Jonna Saxberg

Lyömätön linja Espoossa ry (Espoo Unbeatable Line Association): Kostas Tassopoulos (Teija Huovila)

Maria Akatemia: Sari Nyberg (Hanna Kommeri)

Miessakit Association: Matti Kupila (Roope Karjalainen)

Mannerheim League for Child Welfare: Marie Rautava (Tatjana Pajamäki)

MONIKA – Multicultural Women's Association Finland: Natalie Gerbert (Ljudmila Kettunen)

National Women's Line in Finland: Katju Aro (Louna Hakkarainen)

Save the Children Finland: Tanja Simola (Tiina-Maria Levamo)

Victim Support Finland: Jaana Koivukangas (Leena-Kaisa Åberg)

Seta – LGBTI Rights in Finland: Kerttu Tarjamo (Lotte Telakivi)

Tampere Settlement Association: Päivi Sinkkonen (Jutta Väänänen)

Protect Children: Nina Vaaranen-Valkonen (Anna Ovaska)

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Family Federation of Finland: Antti Lahtinen (Mina Zandkarimi)

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Taina Riski, Finnish Institute for Health and Welfare

Appendix 2 List of proposals and suggestions by GREVIO

- I. Purposes, definitions, equality and non-discrimination, general obligations**
- B. Scope of application of the convention and key definitions (Articles 2 and 3)**
 1. GREVIO recalls that Article 2, paragraph 1, of the Istanbul Convention affirms the notion that all forms of violence against women, including domestic violence, affect women disproportionately. GREVIO thus strongly encourages the Finnish authorities to enhance the application of a gendered perspective in the implementation of the Istanbul Convention, including its provisions in relation to domestic violence (paragraph 5).
- C. Fundamental rights, equality and non-discrimination (Article 4)**
 - 1. Intersectional discrimination**
 2. GREVIO strongly encourages the Finnish authorities to take measures to ensure that the provisions of the Istanbul Convention are implemented without discrimination on any of the grounds listed in Article 4, paragraph 3. This includes improving the regional accessibility of shelters as indicated in the Action Plan for the Istanbul Convention (paragraph 14).
- II. Integrated policies and data collection**
- A. Comprehensive and co-ordinated policies (Article 7)**
 3. GREVIO strongly encourages the Finnish authorities to develop, on the basis of the existing NAPs and the lessons learnt therefrom, a long-term co-ordinated plan/strategy placing the rights of victims at the centre of all measures to implement the Istanbul Convention in its entirety, giving due importance to all forms of violence against women. GREVIO encourages the Finnish authorities to ensure that the gendered nature of all forms of violence against women, including domestic violence, receives the necessary policy attention (paragraph 22).
- B. Financial resources (Article 8)**
 4. GREVIO strongly encourages the Finnish authorities to ensure appropriate human and financial resources for any policies, measures and legislation aimed at preventing and combating violence against women and for the institutions and entities mandated with their implementation. GREVIO also encourages Finland, as a champion in gender budgeting, to engage in the appropriate budgeting of comprehensive measures to prevent and combat violence against women and domestic violence (paragraph 28).
- C. Non-governmental organisations and civil society (Article 9)**
 5. GREVIO strongly encourages the Finnish authorities to further recognise, encourage and support co-operation with all non-governmental actors involved in preventing and combating violence against women in Finland to ensure their participation in the design of policies and programmes, in particular NAPs and the provision of services, counselling, advocacy and awareness raising. In order to ensure diversity and build policies around the experiences of all women in Finland, GREVIO further encourages the Finnish authorities to recognise, encourage and support, including financially, a greater variety of women's NGOs, including the support of community-based grassroots movements of migrant and other women in Finland (paragraph 31).

D. Co-ordinating body (Article 10)

6. GREVIO strongly encourages the Finnish authorities to assign the role of co-ordinating body to fully institutionalised entities, to equip these with clear mandates, powers and competences and to allocate the necessary human and financial resources to these entities in order to guarantee the effective independent evaluation of national policies to prevent and combat violence against women (paragraph 35).

E. Data collection and research (Article 11)**1. Administrative data collection**

7. GREVIO strongly encourages the Finnish authorities to develop data categories for mandatory use by the law-enforcement agencies and the judiciary on the type of relationship between the perpetrator and the victim, in order to document the nature of their relationship more specifically. Additional elements such as the gender and age of victim and perpetrator, type of violence and geographical location must also be recorded. GREVIO also encourages the Finnish authorities to move towards a common data-collection system for all levels of the judiciary and the law-enforcement agencies (paragraph 40).
8. GREVIO encourages the Finnish authorities to ensure the collection in the health care sector and social services of data related to violence against women – disaggregated by sex, age and relationship of the perpetrator to the victim, type of violence and geographical location (paragraph 43).
9. GREVIO encourages the Finnish authorities to conduct dedicated surveys on all forms of violence against women at regular intervals and to carry out a population-based survey to assess Sámi women's exposure to sexual and domestic violence as a starting point for further policy measures (paragraph 47).
10. GREVIO encourages the Finnish authorities to : (paragraph 51)
 - a. address, through research, all forms of violence against women, such as sexual violence, stalking, forced sterilisation, forced marriage or other traditional practices harmful to women and not previously covered;
 - b. support research into violence which affects specific groups of victims, such as migrant women and women from ethnic minorities;
 - c. support research in order to study the effects on children of witnessing domestic violence;
 - d. continue investing in the evaluation of existing policies and practices, including protective measures for victims, to assess their efficiency and level of implementation, as well as the level of victim satisfaction with the services provided, in close co-operation with specialist support services.

III. Prevention**A. Awareness raising (Article 13)**

11. GREVIO strongly encourages the Finnish authorities to promote or conduct, on a regular basis and at all levels, awareness-raising campaigns or programmes on the different manifestations of violence against women, including in co-operation with national human rights institutions, equality bodies, civil society and non-governmental organisations, especially women's organisations. GREVIO also strongly encourages the Finnish authorities to take measures to promote programmes and activities for the empowerment of women and girls, including women and girls from specific groups and communities (paragraph 57).

B. Education (Article 14)

12. GREVIO encourages the Finnish authorities to review their central policy documents and materials, including school materials, in order to ensure that all forms of violence against women and girls are addressed in an age-appropriate way. GREVIO also encourages Finland to ensure that staff in educational institutions are aware of how to identify and address the different forms of violence covered by the convention. Finally, it encourages Finnish authorities to promote inclusion of these issues in the curricula of all relevant professions (paragraph 64).

C. Training of professionals (Article 15)

13. GREVIO urges the Finnish authorities to introduce systematic and mandatory initial and in- service training on all forms of violence covered by the Istanbul Convention for all law-enforcement officers and prosecutors. GREVIO strongly encourages training for all professionals working with women or children who are victims of violence to ensure knowledge of the particular characteristics and needs of different vulnerable groups and to base this training on clear protocols and guidelines that set the standards that staff are expected to follow in their respective fields (paragraph 72).
14. GREVIO also encourages the Finnish authorities to develop and widely disseminate guidelines for the handling of different forms of violence covered by the Istanbul Convention, taking into account the characteristics of each form, their interconnectedness, the risk factors for re-victimisation and how violence can affect the ability and willingness of persons with different backgrounds to disclose the violence to the police or other public authorities (paragraph 73).

D. Preventive intervention and treatment programmes (Article 16)**1. Programmes for perpetrators of domestic violence**

15. GREVIO notes the need to ensure more standardised approaches and strongly encourages the Finnish authorities to adopt and implement uniform standards which place at their centre the safety of, support for and human rights of victims by co-operating closely with specialist support services for victims as required by Article 16, paragraph 3, of the Istanbul Convention. GREVIO further strongly encourages the Finnish authorities to use all available means to ensure that such programmes are widely attended, including by incorporating them into the criminal justice system, including the probation service, as a tool to reduce recidivism. The authorities are encouraged to initiate scientific outcome studies (evaluation) of the programmes to assess, among other aspects, the risk of re-offending, in order to ensure higher levels of safety and protection for victims (paragraph 79).

E. Participation of the private sector and the media (Article 17)

16. With a view to the important role of the media and the private sector in shaping and changing attitudes to the status and role of women in society and the level of acceptance of violence against women, GREVIO encourages the Finnish authorities to set incentives, or otherwise promote, the development and monitoring of self-regulatory standards in relation to the non-stereotypical and non- sexist portrayal of women in the media, including in the context of reporting on violence they have suffered (paragraph 88).

IV. Protection and support

A. General obligations (Article 18)

17. GREVIO strongly encourages the Finnish authorities to take adequate measures to set up institutionalised structures for co-ordination and co-operation among the different governmental and non-governmental agencies and service providers to ensure adequate forms of multi-agency co-operation based on a gendered understanding of violence against women and domestic violence and focusing on the human rights and safety of victims, as well as on their empowerment and economic independence. This should include guidelines and co-operation procedures/protocols for authorities dealing with violence against women and domestic violence, including specific forms such as forced marriage and “honour-related violence”, as well as a system for sharing expertise and experience in handling such cases. GREVIO strongly encourages the inclusion of specialist women’s support services run by NGOs, and representing victims in multi-agency work, in any formal and informal co-operation structures (paragraph 93).

C. General support services (Article 20)

1. Social services

18. GREVIO strongly encourages the Finnish authorities to ensure, among local, municipal and regional authorities and social services, the setting-up of programmes to ensure the recovery of victims from violence and to ensure their economic independence, in the area of financial assistance, education, training and assistance in finding employment. Specific attention should be given to the provision of affordable, permanent housing to all women victims of violence and their children, in particular to victims who cannot stay in their home and as a follow-up measure after a stay at a women’s shelter. Higher degrees of awareness of the different forms of violence against women, and cultural sensitivity towards the specific situation of women from national minorities such as the Sámi as well as other distinct groups of women in Finland, are also needed. The aim of such heightened awareness must be the provision of adequate support tailored to the individual specificities, rights and needs of all victims, and to overcome language barriers (paragraph 104).
19. GREVIO strongly encourages the Finnish authorities to establish and implement quality standards and protocols on all forms of violence against women in all health institutions and to increase the capacity of health care professionals to identify women victims of all forms of violence in order to provide adequate treatment and assistance to them, as well as their referral to appropriate specialist women’s support services as part of a co-ordinated response (paragraph 106)

D. Specialist support services (Article 22)

20. GREVIO strongly encourages the Finnish authorities to take measures to ensure the provision of specialist women’s support services with a gendered approach, providing comprehensive, immediate, short- and long-term support to all women victims of violence and their children in all parts of Finland. Police and other institutions need to refer to such specialist women’s services directly and must avoid repeat referrals. Especially after police intervention a proactive approach is needed to ensure that victims are reached and can exercise their rights to protection and support (paragraph 111).

E. Shelters (Article 23)

21. GREVIO strongly encourages the Finnish authorities to pursue and step up their efforts in expanding the number of shelter places and the geographic distribution of shelters in Finland to reach the minimum standard of one family place per 10 000 head of population as set out in the Explanatory Report to the Istanbul Convention, to resource shelters adequately, to provide long-term funding and to provide women-only shelters for women victims of violence and their children. Moreover, GREVIO encourages the Finnish authorities to assess the availability, in practice, of shelters for women with disabilities, women from the different Roma communities and women with substance-abuse issues (paragraph 117).

F. Telephone helplines (Article 24)

22. GREVIO encourages the Finnish authorities to ensure the services of the Nollalinja national telephone helpline in a wider variety of languages, in particular Sámi, in order to reduce the language barriers that some women in Finland currently experience when seeking help. GREVIO also encourages the Finnish authorities to actively advertise the Nollalinja helpline as a service for all forms of violence which women in Finland may experience, in particular forced marriage, FGM and "honour-related" forms of violence (paragraph 120).

G. Support services for victims of sexual violence (Article 25)

23. GREVIO strongly encourages the Finnish authorities to pursue their efforts in setting up sexual violence referral centres across the country and to ensure the availability of additional services to offer support to women and girls who seek help days, weeks, months or even years after the event. GREVIO also strongly encourages the Finnish authorities to ensure the setting-up of low- threshold services providing comprehensive and practical support, including legal support to access victims' rights and protective measures as well as long-term psychosocial support for all victims of rape and sexual violence (paragraph 126).

H. Protection and support for child witnesses (Article 26)

24. GREVIO strongly encourages the Finnish authorities to ensure the availability of age-appropriate psychosocial counselling for child witnesses of all forms of violence covered by the Istanbul Convention, in particular for children who witness domestic violence and post-separation stalking by one parent against the other (paragraph 131).

V. Substantive law**A. Civil law****2. Compensation (Article 30)**

25. GREVIO invites the Finnish authorities to collect data on the number of cases of violence against women in which perpetrators have been ordered to pay compensation to the victim (paragraph 142).

3. Custody and visitation rights (Article 31)

26. GREVIO urges the Finnish authorities to take the necessary measures, including legislative amendments, to ensure that courts are under the obligation:
- to consider all issues related to violence against women when determining custody and visitation rights;
 - to ensure the recognition of witnessing violence against a close person as jeopardising the best interest of the child, and
 - to restrict custody and visitation rights where this is warranted to guarantee the safety and best interest of the child (paragraph 150).

4. Civil consequences of forced marriages (Article 32)

27. GREVIO encourages the Finnish authorities to incorporate in the relevant legislative act(s) the possibility of voiding, annulling or dissolving marriages concluded under force (paragraph 152).

B. Criminal law**1. Psychological violence**

28. GREVIO strongly encourages the Finnish authorities to investigate, prosecute and punish effectively acts of psychological violence by making full use of the available provisions in the Finnish Criminal Code. To effectively criminalise all acts that seriously impair the psychological integrity of a person as required by Article 33, GREVIO strongly encourages the authorities to consider introducing a new provision that would better fit the Istanbul Convention's framework (paragraph 159).

2. Stalking (Article 34)

29. GREVIO strongly encourages Finland to revise or reform the existing guidance to ensure that the offence of stalking as enshrined in the Finnish Criminal Code does not require that the acts are made against the victim's will and to ensure that continual stalking represents an aggravated form of stalking. In order to ensure the effective implementation of the stalking offence, GREVIO encourages the Finnish authorities to conduct specialised training on the gendered and serious nature of stalking and to ensure the application of preventive operational measures to avoid re-offending (paragraph 164).

3. Sexual violence and rape (Article 36)

30. GREVIO strongly encourages Finland to speedily reform all sexual offences contained in Chapter 20 of the Finnish Criminal Code to fully incorporate the notion of freely given consent as required by Article 36 of the Convention and to ensure appropriate sanctions for all sexual acts without the consent of the victim, including where the circumstances of the case preclude valid consent (paragraph 169).

4. Forced marriage (Article 37)

31. GREVIO strongly encourages the Finnish authorities to consider introducing a specific criminal offence of forced marriage to cover the special nature of these offences and to make it operational for law-enforcement authorities and courts. Moreover, GREVIO encourages Finland to criminalise the intentional conduct of luring an adult or a child to the territory of another state with the purpose of forcing this person into a marriage, as required by Article 37, paragraph 2, of the Istanbul Convention (paragraph 175).

5. Female genital mutilation (Article 38)

32. GREVIO encourages the Finnish authorities to criminalise the intentional conduct of inciting, coercing or procuring a girl to undergo FGM as required by Article 38 c of the Istanbul Convention (paragraph 178).

6. Sexual harassment (Article 40)

33. GREVIO encourages the Finnish authorities to ensure that sexual harassment experienced in all areas of life is subject to a legal sanction (paragraph 182).

7. Sanctions and measures (Article 45)

34. GREVIO strongly encourages the Finnish authorities to ensure – through legislative measures and the effective training of members of the judiciary and prosecution services – that sentences and measures imposed for all forms of violence against women are effective, proportionate and dissuasive (paragraph 185).

8. Aggravating circumstances (Article 46)

35. GREVIO strongly encourages the Finnish authorities to take appropriate measures to ensure that the presence of children is considered as an aggravated circumstance by the judiciary, together with all other aggravating circumstances listed in Article 46 of the Istanbul Convention (paragraph 188).¹⁰⁷

¹⁰⁷. See also the emerging case law of the European Court of Human Rights, which states that under the Istanbul Convention, "more severe sentences are required when the offence is committed against or in the presence of a child" (*D.M.D. v. Romania*, Judgment, 3 October 2017, p. 9, paragraph 27).

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

36. GREVIO urges the Finnish authorities to introduce clear protocols and guidelines on mediation in domestic violence cases with a view to ensuring that:
- all law-enforcement and prosecution staff are aware that mediation is prohibited in cases of repeated violence;
 - all offers of mediation are accepted entirely voluntarily;
 - an offer of mediation does not result in the discontinuation of criminal investigation and prosecution in violence against women cases.

In addition, GREVIO urges the Finnish authorities to reconsider the power vested in the police to propose mediation as a criminal justice measure in domestic violence cases, because having this power might jeopardise the effectiveness of criminal investigations (paragraph 193).

VI. Investigation, prosecution, procedural law and protective measures

A. Immediate response, prevention and protection (Article 50)

1. Reporting to and investigations by law-enforcement agencies

37. GREVIO urges the Finnish authorities to equip all relevant law-enforcement authorities with the resources, knowledge and powers to respond promptly and appropriately to all forms of violence covered by the Istanbul Convention, in particular by raising the number of female police officers and equipping police with the mandate to refer victims of violence against women and domestic violence to specialist women's support services in order to ensure the provision of adequate support (paragraph 203).

2. The role of the prosecution services and conviction rates

38. GREVIO strongly encourages the Finnish authorities to swiftly identify and address any/all factors which contribute to attrition in cases of rape, domestic violence and any other forms of violence against women, in order to increase the number of convictions (paragraph 210).

C. Risk assessment and risk management (Article 51)

39. GREVIO encourages the Finnish authorities to ensure that, in cases of violence against women and domestic violence, systematic and gender-sensitive risk assessment and safety management become standard procedure for all agencies involved, especially criminal justice agencies, and that effective multi-agency work is carried out in all regions, based on the human rights and safety of the individual victim, all the while ensuring that the rights and needs of children are represented by specialist women's support services (paragraph 214).

D. Emergency barring and protection orders (Articles 52 and 53)

40. GREVIO strongly encourages the Finnish authorities to step up efforts to increase the use of emergency barring and protection orders by promoting their usefulness and ensuring their vigilant enforcement. In this regard, GREVIO urges the Finnish authorities to assess the level of implementation of the Act on Restraining Orders with a view to identifying and remedying any obstacles in the letter of the law or in its practical implementation. Moreover, GREVIO strongly encourages the Finnish law-enforcement authorities to actively refer victims to specialist women's support services to ensure support in exercising their right to protective measures. Lastly, GREVIO strongly encourages the Finnish authorities to end the practice of allowing for exceptions in prohibitions on contact (paragraph 225).

E. Victim support in legal proceedings (Article 55, paragraph 2)

F. Legal aid (Article 57)

VII. Migration and asylum

41. GREVIO encourages the Finnish Migration Service to recognise the particular hardship which the revocation of a residence permit may result in for foreign women in Finland abused by their sponsoring spouse or partner, in particular where this may lead to them being separated from their children (paragraph 240).
 42. Lastly, GREVIO urges the Finnish authorities, in particular the Finnish Migration Service, to take all measures to remove excessively high evidential barriers, such as the requirement of a criminal conviction of the abuser, for applications for extended residence permits on the basis of Section 54, sub-section 7, of the Aliens Act (paragraph 242).
- 1. Reception and accommodation**
46. With the purpose of furthering gender-sensitive asylum procedures, GREVIO encourages the Finnish Immigration Service (MIGRI) (paragraph 253):
 - to take active measures to ensure that women asylum seekers are interviewed separately from, and without the presence of, any relatives;

SOURCES

- Action plan for the Istanbul Convention for 2018–2021. Publications of the Ministry of Social Affairs and Health 2017:16. Available in English (2017:18) at: <http://urn.fi/URN:ISBN:978-952-00-3972-1>.
- Action plan for the prevention of female genital mutilation (FGM). Publications of the Ministry of Social Affairs and Health 2021:16. English translation of an older version (2019:7) available at: <http://urn.fi/URN:ISBN:978-952-00-4065-9>.
- Alaattinoğlu, Daniela & Kainulainen, Heini & Niemi, Johanna. 2020. Raiskausrikosten eteneminen rikosprosessissa [*The Progress of Rape Offences in the Finnish Criminal Process*]. Research papers and reports of the Faculty of Law 1/2020.
- Arviomuistio avioliittoon pakottamisen rangaistavuudesta [*Memorandum on the Punishability of Forcing a Person to Enter into Marriage*]. Publications of the Ministry of Justice. Memorandums and statements 2021:29. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-820-2>.
- Costs of domestic violence in Finland (LAKU). Available in English at: <https://thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/costs-of-domestic-violence-in-finland-laku>.
- Federation of Mother and Child Homes and Shelters 17 February 2021 (1/2021). Available in Finnish at: <https://ensijaturvakotienliitto.fi/enska/korona-mullisti-avun-hakemisen/>.
- Fighting the lottery – Overcoming barriers to justice for women rape survivors in Finland. Amnesty International Finnish Section 6 March 2019.
- Finland fights human trafficking – Action Plan against Trafficking in Human Beings. Available in English at: <http://urn.fi/URN:ISBN:978-952-259-824-0>.
- Gender Equality Barometer 2017. Publications of the Ministry of Social Affairs and Health 8/2018. Available in English (12/2018) at: <http://urn.fi/URN:ISBN:978-952-00-4012-3>.
- GREVIO Baseline Evaluation Report Finland. 2019. Available in English at: <https://rm.coe.int/grevio-report-on-finland/168097129d>.
- GREVIO General Recommendation on the digital dimension of violence against women. Available in English at: <https://rm.coe.int/grevio-rec-no-on-digital-violence-against-women/1680a49147>.
- Haapakangas, Kimmo. 1 June 2021: Vanhempien lapsiinsa kohdistama väkivalta väheni koronavuonna [*Violence against children by parents decreased during the pandemic year*]. Statistics Finland. Tieto & trendit [*Data & Trends*]. Articles. Available in Finnish at: <https://www.stat.fi/tietotrendit/artikkelit/2021/vanhempien-lapsiinsa-kohdistama-vakivalta-vaheni-koronavuonna-avopuolisoiden-valiset-teot-kasvoivat-eniten/>.
- Hakkarainen, Louna: Digitaalinen väkivalta parisuhteessa ja sen jälkeen [*Digital violence during and after an intimate relationship*]. Opas väkivallan kokijalle, ammattilaiselle ja läheiselle [*Guide to victims of violence, professionals and loved ones*]. In Finnish. National Women's Line in Finland. 2019.
- Hansen, Sams, Jäppinen & Latvala. 2016. Kunniakäsitykset ja väkivalta [Concepts of honour and violence]. Selvitys kunniaan liittyvästä väkivallasta ja siihen puuttumisesta Suomessa [*A report on honour-related violence and the addressing of it in Finland*]. Finnish League for Human Rights. Available in Finnish (English summary) at: https://ihmisoikeusliitto.fi/wp-content/uploads/2016/06/Kunniak%C3%A4sitykset-ja-v%C3%A4kivalta_B5_netiti-002.pdf.

- Impacts of the coronavirus epidemic on experiences of domestic violence and the use of services (KOVÄ). Available in English at: <https://thl.fi/en/web/thlfi-en/research-and-development/research-and-projects/impacts-of-the-coronavirus-epidemic-on-experiences-of-domestic-violence-and-the-use-of-services-kova->.
- Kansallisen lapsistrategian toimeenpanosuunnitelma: Valtioneuvoston periaatepäätös [*Implementation plan for the National Child Strategy: Government resolution*]. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-383-868-0>.
- Kovanen, Tuulia. 2019: Seurustelun ei kuulu satuttaa [*Dating shouldn't hurt*]! Suomalaisten nuorten kokemuksia seurusteluväkivallasta [*Experiences of dating violence among young Finns*]. Ensi- ja turvakotien liitto [*Federation of Mother and Child Homes and Shelters*].
- Lähisuhdeväkivalta koronapandemian aikana vauvaperheiden vanhemmilla ja Nollalinjan auttavan puhelimen keskusteluissa [*Domestic violence during the COVID-19 pandemic among parents of families with newborns and in Nollalinja helpline conversations*]. Finnish Institute for Health and Welfare. Tutkimuksesta tiiviisti [*Research Reviews*] 2/2021 (Johanna Hietämäki, Anniina Kaittila, Jarno Tuominen, Maaret Vuorenmaa, Marita Husso, Joonas Peltonen, Anu Karhinen-Soppi).
- Lakeus, Mari & Keskinen, Laura. 2021. Verkossa satutetut [*Hurt online*]. Selvitys naisiin ja sukupuolivähemmistöihin kohdistuvan verkkohäirinnän seurauksista [*A study on the consequences of online harassment against women and LGBTQI minorities*]. The report was produced as part of the S@fety Net project of the National Women's Line in Finland, 2021. Available in Finnish at: https://assets.ctfassets.net/hiiewat8h/77ZBbcKYCsv2YfLeI5A-xn2/6aab09d758fd0bacaf33bba34c69a28e/Verkossa_satutetut_raportti.pdf.
- Making Finland a Global Leader in Gender Equality: Government Action Plan for Gender Equality 2020–2023. Publications of the Ministry of Social Affairs and Health 2020:35. Available in English (2021:10) at: <http://urn.fi/URN:ISBN:978-952-00-8666-4>.
- Mohamed, Abdirizak Hassan & Latvala, Johanna. 2020. FGM – Awareness and perceptions of Somali men in the Helsinki region, Finland. Finnish League for Human Rights. Available in English at: <https://ihmisoikeusliitto.fi/wp-content/uploads/2020/09/FGM-Awareness-and-perceptions-of-Somali-men-in-the-Helsinki-region.pdf>.
- Naisiin kohdistuvan väkivallan torjuntaohjelma vuosille 2020–2023 [*Action Plan for Combating Violence against Women for 2020–2023*]. Publications of the Ministry of Justice. Memorandums and statements 2020:15. Available in Finnish (English abstract) at: <http://urn.fi/URN:ISBN:978-952-259-835-6>.
- Nipuli, Suvi. 2019. Lähisuhdeväkivaltaan puuttumisen ja ehkäisyn prosessit [*Report on the processes for intervening in and preventing intimate partner violence*]. Lähisuhdeväkivaltatyön hyvät käytännöt rakenteisiin [*Integrating good practices of intimate partner violence work into structures*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2019:55. Available in Finnish (English summary) at: <http://urn.fi/URN:ISBN:978-952-00-4121-2>.
- Onko reitti selvä [*Is the coast clear*]? Naisiin kohdistuva väkivalta ja ihmisoikeusvelvoitteiden toteutuminen kunnissa [*Violence against women and realisation of human rights obligations in municipalities*]. Amnestyn seurantatutkimus [*Amnesty follow-up survey*] 2021. Amnesty International Finnish Section. Helsinki 2021. Available in Finnish at: <https://www.amnesty.fi/uploads/2021/05/amnestyn-seurantatutkimus-2021.pdf>.
- Onko Suomi maailman turvallisin maa kaikille [*Is Finland the Safest Country for Everybody*]? Turvallisuuden toteutuminen eri sukupuolten ja väestöryhmien kannalta [*Realisation of safety in respect of different genders and population groups*]. KPMG Oy Ab 25 May 2018.
- Opas lapsenhuoltolain mukaisen selvityksen laatimiseksi [*Handbook for drawing up reports under the Child Custody Act*]. Recommendation by a group of experts. Directions 2/2021. Martta Ochober & Jaana Tervo (eds.). Finnish Institute for Health and Welfare. Available in Finnish at: https://www.julkari.fi/bitstream/handle/10024/143747/URN_ISBN_978-952-343-733-3.pdf.

- Poliisin toiminta perhe- ja lähisuhdeväkivallan sekä naisiin kohdistuvan väkivallan tapauksissa [*Police action in connection with incidents of domestic and intimate partner violence and violence against women*]. Guidelines 11 May 2020. POL-2020-28566.
- Recognise, protect and act. Recommendations for the prevention of interpersonal and domestic violence. How to guide and lead local and regional activities in social and health care service. Publications of the Ministry of Social Affairs and Health 2008:9. Available in English (2008:26) at: <http://urn.fi/URN:NBN:fi-fe201504224672>.
- Rowlands, J. 2019. Reviewing domestic homicide. International practice and perspectives. Project report Winston Churchill Memorial Trust. Available at: <http://sro.sussex.ac.uk/id/eprint/92181/3/James%20Rowlands%20Churchill%20Fellowship%20Report%20%28final%20for%20publication%29.pdf>.
- School Health Promotion Study 2019. Finnish Institute for Health and Welfare. Results available in Finnish at: thl.fi/kouluterveyskysely/tulokset.
- School Health Promotion Study 2021. Finnish Institute for Health and Welfare. Results available in Finnish at: thl.fi/kouluterveyskysely/tulokset.
- Seksuaali- ja sukupuolivähemmistöön kuuluvien perus- ja ihmisoikeudet Suomessa [*Fundamental and human rights of sexual and gender minorities in Finland*]. Ministry of Justice. Reports and guidelines 34/2014. Available in Finnish at: <http://urn.fi/URN:ISBN:978-952-259-388-7>.
- Seri-tukikeskusten asiakkaiden tausta, tukipalveluiden käyttö ja rikosprosessin eteneminen [*The background of the clients in Seri Support Centres, their use of support services and the progress of the criminal procedure*]. Available in Finnish at: <https://tietokayttoon.fi/-/seri-tukikeskusten-asiakkaiden-tausta-tukipalveluiden-kaytto-ja-rikosprosessin-eteneminen>.
- Statistics Finland: Statistics on offences and coercive measures 2020.
- Statistics Finland: Statistics on offences and coercive measures 2021, 3rd quarter.
- Sutela H. & Pärnänen, A. & Keyriläinen, M. 2019. Digiajan työelämä – Työolotutkimuksen tuloksia 1977–2018 [*Working life in the digital age – results of the Quality of Work Life Surveys 1977 to 2018*]. Suomen virallinen tilasto [*Official Statistics of Finland*]. Statistics Finland.
- Swedish National Board of Health and Welfare. 2022. Socialstyrelsens utredningar av vissa skador och dödsfall [*Investigations by the Swedish National Board of Health and Welfare of certain injuries and deaths*] 2018–2021. Available in Swedish at: <https://www.socialstyrelsen.se/globalassets/sharepoint-dokument/artikelkatalog/ovrigt/2022-1-7738.pdf>.
- Tapahtumaketjut naisiin kohdistuvissa parisuhdetapauksissa [*Examining the chains of events leading to intimate partner homicide against women*]. Available in Finnish at: <https://tietokayttoon.fi/-/tapahtumaketjut-naisiin-kohdistuvissa-parisuhdetapauksissa>.
- Tilasto-ohjelma 2021–2023 [*Statistical programme 2021–2023*]. Liite 3 [*Appendix 3*]. Tilastokeskuksen tiedonkeruut 2021 [*Statistics Finland's data collections 2021*]. Available in Finnish at: https://www.stat.fi/static/media/uploads/org/tilastokeskus/tilasto-ohjelma_2021-2023_liite_3_tilastokeskuksen_tiedonkeruut_2021.pdf.
- Tilastoraportti [*Statistical Reports*] 17/2021. Turvakotipalvelut [*Shelters for victims of domestic violence*] 2020. Finnish Institute for Health and Welfare, Helsinki. Available in Finnish (English summary) at: https://www.julkari.fi/bitstream/handle/10024/142646/Tilastoraportti%202020%2028.5.2021_FINAL.pdf.
- Tilastoraportti [*Statistical Reports*] 3/2021. Lähisuhdeväkivalta [*Intimate partner violence*] 2019. Finnish Institute for Health and Welfare. In Finnish.
- Toimenpideohjelma kiusaamisen, väkivallan ja häirinnän ehkäisemiseksi varhaiskasvatuksessa, kouluissa ja oppilaitoksissa [*Action plan to prevent bullying, teasing, violence and harassment in early childhood education, schools and other educational institutions*]. Opetus- ja kulttuuriministeriö [*Ministry of Education and Culture*] 26 January 2021. In Finnish.

- Toimintarajoitteisten nuorten hyvinvointi ja avun saaminen – Toteutuuko yhdenvertaisuus [*Disabled young people's wellbeing and access to assistance – Is equality being achieved?*] Tutkimuksesta tiiviisti [*Research Reviews*] 24/2017. Finnish Institute for Health and Welfare. Available in Finnish at: https://www.julkari.fi/bitstream/handle/10024/135231/URN_ISBN_978-952-302-838-8.pdf.
- Toivonen, Virve. 2017. Pakkoavioliittojen esiintyminen ja ilmitulo Suomessa [*Prevalence and detection of forced marriage in Finland*]. Discussion paper. Institute of Criminology and Legal Policy. University of Helsinki. In Finnish.
- Törmä, Sinikka ja Pentikäinen, Merja: Tavoitteena naisiin kohdistuvasta väkivallasta ja perheväkivallasta vapaa Suomi – Naisiin kohdistuvan väkivallan vähentämisen ohjelmasta Istanbulin sopimuksen toimeenpanoon [*Towards a Finland Free of Violence against Women and Domestic Violence – From the Action Plan to Reduce Violence against Women to the implementation of the Istanbul Convention*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2016:15. Available in Finnish (English summary) at: <http://urn.fi/URN:ISBN:978-952-00-3707-9>.
- Use of information and communications technology by individuals 2020. Statistics Finland. Available in English at: https://www.stat.fi/til/sutivi/2020/index_en.html.
- Vaitomaa, Muukkonen & Rautio (eds.) 2021. Vaativan erotyön käsikirja [*Handbook for demanding divorce counselling*]. Federation of Mother and Child Homes and Shelters. Available in Finnish at: https://issuu.com/ensi-jaturvakotienliitto/docs/digi_etl_vaativa_eroty_2021_sivuttain.
- Väkivallaton lapsuus 2020–2025: toimeenpano ja viestintä [*Non-Violent Childhoods 2020–2025 – implementation and communication*]. Reports and Memorandums of the Ministry of Social Affairs and Health 2021:17. Available in Finnish (English summary) at: <http://urn.fi/URN:ISBN:978-952-00-5406-9>.
- Vammaisten henkilöiden kokeman lähisuhdeväkivallan yleisyys ja palvelujen saatavuus – määrällinen ja laadullinen tarkastelu [*Frequency of domestic violence experienced by persons with disabilities and availability of services – a quantitative and qualitative examination*]. Available in Finnish at: <https://tietokayttoon.fi/-/vammaisten-henkiloiden-kokeman-lahisuhdevakivallan-yleisyys-ja-palvelujen-saatavuus-maarallinen-ja-laadullinen-tarkastelu>.
- Vuoden 2021 tulossopimus [*Performance Agreement for 2021*]. POL-2020-79684. National Police Board and Police University College.
- Yhteisymmärrysmuistio (VNK) [*Memorandum of Understanding (Prime Minister's Office)*] 8 February 2022: [Rahapelituotoilla rahoitettavien yleishyödyllisten toimintojen uusi rahoitusmalli](#) [*New funding model for non-profit activities funded through gambling proceeds*]. In Finnish.



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ISSN PDF 1797-9854
ISBN PDF 978-952-00-9704-2