

Annex 5

Country Case: Finland

Annex 5 of the Talent Attraction and Work-related Residence Permit Process
Models in Comparison Countries -report

Gunta Ahlfors – Inka Saarela

Contents

1	Introduction	3
1.1	Structure and main actors in talent attraction.....	4
1.2	Main target groups of talent attraction.....	9
1.3	Major legislative changes related to talent attraction	10
1.4	Talent attraction and COVID-19.....	11
2	Residence permit models	13
2.1	Work-related residence permit schemes.....	15
2.2	International students and researchers.....	23
2.3	Application forms and fees.....	27
2.4	The application process: The specialist scheme.....	28
2.4.1	Family members of skilled worker permits	33
2.5	Identified bottlenecks in the permit process and possible solutions to them.....	34

1 Introduction

Finland develops labour migration in different ways to better meet the demand for labour in Finland. The Finnish population is ageing, and the birth rate is insufficient to maintain population growth. This means that the working-age population is decreasing and some sectors lack workers. One solution to the problems facing the labour market and the maintaining of the welfare society is immigration¹.

The global competition for international talent is fierce. In last decade, Finland has put a growing effort on developing the means and successful models to be the country that international talent are attracted to and willing to stay in. However, until 2017 and Talent Boost, a programme initiated by government, Finland was lacking a national-level programme or strategy for attracting and retaining international talents. Migration and the mobility of international talent are increasingly important issues for Finland's wellbeing and competitiveness. The availability of talent is one of the biggest obstacles to growth and internationalisation in companies and other organisations².

Another notable issue is the country's demography, where the working age population is decreasing and the dependency ratio is getting worse. The government policy aims to reach a general employment ratio of 75%, to improve the dependency ratio and to enhance the internationalisation of the economy. Without the influx of working age people from abroad, there won't be enough people entering the job market to sustain the social welfare system at its current level. This is a real threat recognised on different levels and there is ongoing search for possible solutions to the challenge ahead.

There is a consensus that Finland wants to attract international talent. Finnish companies need a wide range of skilled employees, but particularly ones with skills currently not available in Finland. Finland's attractiveness to talents and investors alike is also supported by greater diversity in society and working life. On different political levels

¹ The Ministry of the Interior website <https://intermin.fi/en/areas-of-expertise/migration/labour-migration>

² Talent Boost Programme on site of Ministry of Economic Affairs and Employment <https://tem.fi/en/talent-boost-en>

and in higher educational institutions, a consensus has also grown on the importance of not only attracting new students, but also retaining current international degree students in Finland after graduation, as well as attracting and retaining top researchers.

Currently, there are different funding programmes available with the aim of attracting and retaining international talent to support the innovation and development of companies and economy, as well as the integration of immigrants into Finnish society. There is also a high determination to enhance legislation procedures, especially ones affecting the speed and effectiveness of work-related residence permit procedures, in order to achieve an average permit processing time of one month. On the national level, these are gathered under the Talent Boost program to form a coherent whole.

1.1 Structure and main actors in talent attraction

In Finland, the questions related to the attraction of international talent that concern legislation and other framework conditions are managed mostly at the national level. There are three main stakeholders on the ministry level with their distinct roles in policies of the attraction and retention of international talent: the Ministry of Economic Affairs and Employment; the Ministry of Education and Culture and the Ministry of the Interior with its subsidiary the Finnish Immigration Service. In 2017, the government introduced the cross-administrative Talent Boost programme to boost the immigration of senior specialists, employees, students and researchers. Plenty of work has also been done on the regional level involving municipalities, higher education institutions and companies. Talent attraction and retention is undoubtedly a shared interest of the government, cities and companies.

Talent attraction and retention to Finland is still a challenge, as Finland is not among the well-known and attractive countries for the relocation of international talent, despite continually taking the top position in different global ratings when it comes to well-being and innovation.

The main Finnish actors and their role in the talent attraction and retention policies:

The Ministry of Economic Affairs and Employment

In 1997, the responsibilities of the Ministry of Labour increased with refugee and asylum seeker matters, as well as migration matters. In connection with the establishment of the Ministry of Economic Affairs and Employment in beginning of 2008, all

matters related to refugees, asylum seekers and migration were transferred to the Ministry of the Interior. Then, in start of 2012, the tasks concerning immigrant integration were transferred back from the Ministry of the Interior to the Ministry of Economic Affairs and Employment³.

The latest development is that, from the beginning of 2020, the Ministry of Economic Affairs and Employment assumed responsibility for labour migration administration. This responsibility was transferred from The Ministry of the Interior. The transfer of duties was agreed upon in the government programme. The main objective behind this is to link labour and student migration more closely to employment, industrial, innovation, education and immigration policies. The Ministry of Economic Affairs and Employment is now responsible for policies and legislation related to the immigration of workers, students and researchers as well as the development of permit processes. Regardless, the two ministries will continue to cooperate in the preparation of legislation. The ministries are sharing responsibility for performance guidance in labour migration matters⁴.

The Ministry of Education and Culture

The Ministry of Education and Culture is responsible for Policies to promote internationalisation in Finnish higher education and research⁵.

The Ministry of the Interior

The Ministry of the Interior is responsible for immigration policy and legislation on the whole, for general permit conditions and for the performance guidance and resourcing of the Finnish Immigration Service.

The Finnish Immigration Service

The Finnish Immigration Service is a decision-making organisation in matters related to immigration, asylum, refugee status and citizenship and maintains the reception system. The agency implements the Finnish immigration policy and promotes controlled immigration, good administration as well as human and basic rights⁶.

³ Ministry of Economic Affairs and Employment <https://tem.fi/en/history>

⁴ <https://tem.fi/-/tyoperaisen-maahanmuuton-hallinto-siirty-tyo-ja-elinkeinoministerioon>

⁵ Policies to Promote internationalisation in Finnish higher education and research 2017–2025 <https://minedu.fi/documents/1410845/4154572/YMP-en-net.pdf>

⁶ Finnish Immigration Service <https://migri.fi/en/about-the-finnish-immigration-service>

The TE Office and Centres for Economic Development, Transport and the Environment (ELY)

A residence permit for an employed person willing to work in Finland is connected to labour market testing, which means that the employer must establish whether there is available labour force for the job in question within a reasonable time in Finland or within the EU/EEA. The TE Office will assess whether suitable labour for the vacancy in question is available within a reasonable period of time in the local labour market area (EU/EEA area) and will make a partial decision based on the overall assessment⁷.

TE offices and Centres for Economic Development, Transport and the Environment (ELY) play an important role in the Talent Boost program by being a part of the developing international recruitment model and through their services by working directly with companies.

Talent Boost

Talent Boost is a cross-administrative programme of the government designed to boost the immigration of senior specialists, employees, students and researchers⁸. It focuses on attracting the kind of talent that will be instrumental for the growth and internationalisation of Finnish companies and for RDI in the leading growth sectors. It also targets sectors suffering from a labour shortage. The programme aims to raise Finland to a new level in terms of its attractiveness to specialists and their families. The programme supports the government's 75% employment rate target. The Talent Boost programme provides a national framework, structure and a co-operation model for international talent attraction and retention work. The programme is coordinated by the Ministry of Economic Affairs and Employment and the Ministry of Education and Culture.

In addition to the ministries, the steering group includes representatives from Business Finland, Centres for Economic Development, Transport and the Environment (ELY Centres), Employment and Economic Development Offices (TE Offices), the Finnish Immigration Service, the Academy of Finland, the Finnish National Agency for Education, municipalities and higher education institutions. There is continuous dialogue with companies, entrepreneur organisations, chambers of commerce, higher

⁷ More on Partial Decision by the TE-office http://www.te-palvelut.fi/te/en/employers/find_an_employee/work_permit_services/partial_decision_of_the_TE_office/index.html

⁸ Talent Boost's goals and ecosystem in a short video: <https://www.youtube.com/watch?v=qa0JibG0TNA>

education institutions, research institutes, international specialists, and other stakeholders about how to attract international talent and tap into their expertise⁹.

Talent Hubs

Talent Hubs are regional implementations of the Talent Boost programme and are geographical hubs, like cities or regional talent ecosystem management models, that function as a one point of entry through which companies and international talent receive information and guidance on services and requirements regarding the recruitment of international talent (EU and non-EU). The Talent Hub model enables a systematic way to connect different development projects and activities that pertain to international talent. This way, different projects will not remain fragmented, but together make up a functional ecosystem. It is important to mention that Talent Hub is an overall umbrella term. Different cities and regions have given their own names to their Talent Management entities¹⁰.

Business Finland

Business Finland is a Finnish government organisation for innovation funding, export, investments and travel promotion. It is responsible for the nationwide coordination of various business services. Business Finland was created on January 1st 2018 by the merger of two organisations: Finpro, which offered services for internationalization, investments and tourism promotion, and Tekes, which offered funding for innovation activities. The organisation aims to develop Finland to be the most attractive and competitive innovation environment, where companies are able to grow, change and succeed and, therefore, it is also the main actor behind attracting new international start-ups to Finland. An Eligibility Statement from Business Finland is needed prior to applying for a Start-up Residence Permit.

The main focus areas of Business Finland are country brand and image, attracting international start-up teams and founders to Finland, encouraging Finnish SMEs to recruit international talents to boost their international growth and innovation and collaborating with cities, development agencies, universities and other Talent Boost actors to create common tools and platforms, coordinate joint activities abroad and with Finnish companies¹¹.

⁹ Talent Boost Programme <https://tem.fi/en/talent-boost-en>

¹⁰ Talent Boost Cookbook Finland. A publication by Ministry of Economic Affairs and Employment and Business Finland. Version 1.0 <https://tem.fi/documents/1410877/7552084/Talent+Boost+Cookbook+Finland.pdf>

¹¹ Ibid.

EURES

EURES is a European cooperation network of public employment services in the EU countries, Norway, Iceland, Liechtenstein and Switzerland that is designed to facilitate the free movement of workers. The network works to ensure that European citizens can benefit from the same opportunities despite language barriers, cultural differences, bureaucratic challenges, diverse employment laws and a lack of recognition of educational certificates across Europe. EURES has over 3 million jobs in their database as on July 2020. The Finnish stakeholder of EURES is the Employment and Economic Development Office (TE Office).

Universities and institutions of higher education

Universities and HEIs have their own marketing campaigns often in cooperation with other stakeholders in their networks and attract a significant number of international students¹² and researchers to Finland every year. A highly trained workforce and world-class research infrastructure helps Finland attract not only top-level experts, but also international companies and investments. Currently, the continuing concern of higher education institutions is the possibility of employment for international students after graduation. Less than half of students have found employment in Finland 3 years after graduation¹³.

Municipalities

There are regional and local activities aiming to support the attraction and integration of immigrants through systematic planning, resourcing and monitoring as a part of wider strategic policies. The Greater Helsinki region and other larger cities around Finland, especially, are taking an active part in attracting international talent to their region and their companies.

¹² There are around 20 000 foreign students residing in Finland, of which 4000 are doctoral degree students. <http://urn.fi/URN:ISBN:978-952-263-659-1>

¹³ Education Statistics Finland – Vipunen, <https://vipunen.fi/fi-fi>

1.2 Main target groups of talent attraction

There is a chapter devoted solely to work-based immigration and foreign specialists in the strategic themes of government programme under the wider headline "The Government's employment rate target requires an increase in the labour market participation"¹⁴.

The assigned priorities of work-based immigration concern sectors suffering from labour shortages and the specialists, students and researchers essential for leading and growing fields of research, development and innovation¹⁵.

The main priority of talent attraction lays within the geographic area of EU and EEA, supported by the fundamental principle of the free movement of workers in the region. Within the framework of EURES, recruitment events for various industries have already been implemented for a long time and Finland has become a known actor, especially in European Online Job Days, which are virtual recruitment events. However, other European countries are also trying to attract the same kind of talent to their labour market and Finland has started to develop a variety of talent attraction and targeted country brand promotion activities in third countries as well.

Most visible in talent attraction are online campaigns and innovative events fuelled by companies, often in cooperation with municipalities and/or other actors with a special focus on software developers and other ICT specialists. Interestingly, more than half of the persons that were issued a first residence permit for a specialist in 2018 were citizens of India. Most of them came to work in the IT sector¹⁶.

Still, most of the applicants for a residence permit for an employed person are manual labourers. Examples of the sectors for which such residence permits are issued include the agriculture, catering, construction, cleaning and transport.

¹⁴ Finnish Government Programme – Strategic Themes <https://valtioneuvosto.fi/en/marin/government-programme/finland-built-on-trust-and-labour-market-equality>

¹⁵ Ministry of Economic Affairs and Employment <https://tem.fi/en/labour-immigration>

¹⁶ Annual Report on Migration and Asylum, Finland 2018 http://www.emn.fi/files/1970/Maahanmuutto_ja_turvapaikka_2018_FI_EN.pdf

1.3 Major legislative changes related to talent attraction

Until recent years, there were no official national policies related to talent attraction and efforts in this area were mainly undertaken by companies, while searching for their potential employees outside of Finland. Recently, however, it has been the policy of Prime Minister Sipilä's Government (2015–2019), Prime Minister Rinne's Government (2019) and current Prime Minister Marin's Government (2019–) to attract specialists and entrepreneurs to Finland.

Sipilä's Government (2015–2019) also published two programmes associated with labour migration and the efforts to increase it. These are Work in Finland¹⁷ and Talent Boost¹⁸. The objective of these programmes was to make visible and promote migration policy that supports employment as well as migration that strengthens the public economy, improves the dependency ratio and promotes the internationalisation of the economy.

Amendments to the legislation on the permit system represent a policy of streamlining the residence permit process, thus facilitating entry and making Finland more attractive. Five new residence permit categories were introduced in 2018: start-up entrepreneurs, seasonal workers, workers in seasonal employment requiring a separate preliminary decision, intra-corporate transferees and participants in voluntary service. The possibility of obtaining a residence permit for a start-up entrepreneur supports efforts to attract talent to Finland and thus also promotes the importing of innovations. Also, the residence permit for a self-employed person was changed to the residence permit for an entrepreneur. The changes were a result of legislative amendments that entered into force in 2018. At the same time, the duration of residence permits issued to specialists and their family members was changed to two years from the previous time of one year¹⁹.

Under a legislative amendment that entered into force at the beginning of June 2019, labour market testing has been dropped in situations where a person, who has already been working in Finland for at least one year with a permit issued on the grounds of employment, applies for an extended permit for a field different from the

¹⁷ Töihin Suomeen – Hallituksen maahanmuuttopoliittinen ohjelma työperusteisen maahanmuuton vahvistamiseksi <http://urn.fi/URN:ISBN:978-952-324-176-3>

¹⁸ See <https://tem.fi/en/talent-boost-en>

¹⁹ Ministry of the Interior, International Migration 2018–2019 – Report for Finland <http://urn.fi/URN:ISBN:978-952-324-303-3>

one for which the first permit was issued. The purpose of this amendment is to improve the preconditions for workforce mobility²⁰.

1.4 Talent attraction and COVID-19

As of yet, there is no exact knowledge on how the COVID-19 pandemic will affect talent attraction and retention in the long run. The coronavirus pandemic has had numerous significant social and economic side effects. From the perspective of international talent migration, increased unemployment and restrictions on cross-border traffic, in particular, have made local authorities concentrate on reviewing long and short-term action plans. In the summer of 2020, a lot of effort by the Ministry of Economic Affairs and Employment was concentrated on solving key questions like the shortage of seasonal workers, which is especially important for the Finnish agricultural sector during the summer period. Attracting and enabling this group of workers to come to Finland has been a considerable challenge during the COVID-19 pandemic, due to the strict border regulations enforced by different countries.

As the COVID-19 pandemic started, the Talent Boost programme put its focus on international talents already in the country. Virtually all campaigns and other activities related to attracting international talent and experts from abroad were suspended. Finland's ability to survive the crisis and take care of the international community living in Finland is an important test of the service network developed in the Talent Boost programme and the #Finlandworks brand in general. Experiences gained during this time and the resulting reputation of the country shared by the international talents living here to their networks will have a significant impact on future work done in the talent attraction and retention field.

The economy has been predicted to return to its pre-crisis growth trajectory as soon as 2021–2022. Despite the current crises and economic situation, the sustainability of the economy and the safeguarding of the welfare state require a long-term increase in labour and education-based immigration.

The Talent Boost's new action program is designed to accelerate economic growth as part of the recovery from the corona crisis. Particularly in areas of labour demand and in highly skilled jobs, the need for a skilled workforce, students, researchers and start-ups to promote growth and internationalization remains. In some cases, it is even emphasized.

²⁰ Ibid.

No changes have been made to policies, as the reasoning behind them has not changed due to COVID-19 and the need for international talent and work-based immigration is still there. There is a will to look over this crisis and to see the potential in the future.

2 Residence permit models

All work and study-based residence permits are processed and granted in the Finnish Immigration Service. The following chapter focuses on the first residence permit process for applicants outside the EU and EAA countries.

There are 23 different work-related residence permits for applicants from outside the EU/EEA countries. Each permit application is for a different profession or work-based requirement to enter the country.²¹ Some residence permit schemes need partial decisions or statements from another authority. For the residence permit for an employed person scheme, an Employment and Economic Development Office (TE Office) will do the labour market testing and ensure that the terms and conditions of the employment relationship comply with the Finnish labour law, whereupon the Finnish Immigration Service makes the final decision. The entrepreneur scheme is also processed in two stages. First, a Centre for Economic Development, Transport and the Environment (ELY Centre) will make a partial decision to see if the business is profitable, before the Finnish Immigration Service makes the final decision on the permit. For start-ups, there must be a positive Eligibility statement from Business Finland before applying for the actual permit. A negative partial decision leads to a negative decision on the permit from the Finnish Immigration Service. The Employment and Economic Development Office (TE Office) must also consider the regional policy on labour market testing given by the Centre for Economic Development, Transport and the Environment (ELY Centre) while making partial decisions on permits²².

The residence permit process involves various authorities. The Finnish Immigration Service processes and grants all the permits. The planning of the operations and finances of the Finnish Immigration Service follows guidelines confirmed by the Ministry of the Interior. The authorities giving a partial decision or statement, i.e. the Employment and Economic Development Offices (TE Office), the Centres for Economic Development, Transport and the Environment (ELY Centre) and Business Finland, are all under the regulation of the Ministry of Economic Affairs and Employment of Finland. The Finnish missions, embassies and consulates are under the regulation of the Ministry of Foreign Affairs of Finland. All these authorities are included in the pro-

²¹ There are specific residence permit applications for certain types of work or entrepreneurship. These permit application types are referred as schemes here. If there is no specific application for the type of work of the applicant, they can apply for a Residence permit for an employed person.

²² Työ- ja elinkeinoministeriön julkaisuja (2018): Työnteon perusteella myönnettävien oleskelulupien käsittelyn pullonkauloja koskeva esiselvitys. Loppuraportti. Owl Group. Available in: <http://urn.fi/URN:ISBN:978-952-327-341-2>

cessing of residence permits and must be also involved in all development and legislative reforming. From the beginning of 2020, the Ministry of Economic Affairs and Employment has been responsible for the administration of labour migration matters. The reason for this is to include labour migration and bring it closer to employment, innovation and education policies.²³

The estimated processing times for a first residence permit based on work or study depend on the scheme they are applied through. The residence permit must always be applied for personally. An employee or a spouse cannot apply on behalf of the applicant. Most of the applications can be submitted on both paper and in the e-service Enter Finland. Applicants are encouraged to use the e-service with economical procession fees and processing times that can be months shorter. The permit processing time in the specialist scheme is only approximately 1–2 months, while the largest category, the residence permit for an employed person, where a partial decision is needed, can take up to 4 months. There is currently no explicit regulated fast track system in Finland²⁴. The focus lies on making the whole process for work and study schemes faster and simpler to apply for.

Different residence permit schemes also have an effect on when the right to work begins. In the specialist scheme, the applicant can start working before the residence permit has been granted, if they have applied for the permit in Finland. The right to work continues without interruption, if the permit is applied for and granted within 90 days. In the residence permit for an employed person scheme, the right to work begins only after the permit has been granted.

The main bottlenecks identified in the residence permit process involve submitting incomplete applications, identification and interviews abroad in a Finnish mission and to those processes, where other authorities are involved in granting the permit²⁵. The number is significant, since over half of the work-based permit applications require a partial decision before the permit is granted and over 60% of the first residence permits are submitted in a Finnish mission abroad²⁶. The focus is on improving the processes of cross-administrative barriers and on improving information exchange between authorities. The interviews some applicants may have to complete during the permit process in the Finnish missions can have long waiting times. Generally, the length of waiting time for interviews is approximately one month, but occasionally they

²³ The Ministry of the Interior, Finland Invests in Labour Migration, available in: <https://intermin.fi/en/areas-of-expertise/migration/labour-migration>

²⁴ There is currently, for example, no certified employer scheme in Finland, unlike in Sweden.

²⁵ More identified bottlenecks are described in detail in the last chapter.

²⁶ Vuokko, Honkavaara, Siira, Pahkala (2019) Maahantuloprosessien kehittäminen sekä automaatiikan, robotiikan ja tekoälyn hyödyntäminen.

have taken up to 6 months. This process needs to be improved with methods like remote interviewing in a controlled environment conducted by officials from the Finnish Immigration Service. The amount of applications that lack acquired information could be reduced with a get it right the first time principle and, from the users angle, the customer service and the whole permit process should have more transparency. Developing cross-administrative e-services, such as Enter Finland, and a UMA information system is one key element in making the process faster between different authorities. Submitted applications might be pending for a long time on the Employment and Economic Development Office (TE Office) waiting list. The UMA information system can be used to automatize the pre-screening process by creating filters to categorize the applications earlier, when they are received. Also, the legislation that affects the permit process and the possibilities to develop it must be aligned. One aspect of the legislative development work concerns the automatization of the permit process²⁷.

2.1 Work-related residence permit schemes

Applicants outside the EU and EEA countries must apply for a residence permit, if they plan to stay in Finland for over 90 days. A residence permit can be applied for on several different grounds, depending on the profession or work the applicant is planning to do in Finland. In all residence permit schemes, the application must be applied for personally and the identification and biometrics must be given physically in a Finnish mission, if the application is submitted abroad.

There are 23 different work-related residence permits for applicants from outside the EU/EEA countries. Each application has different work-based requirements to enter the country. If the applicant cannot find a scheme for their profession or work description, they must apply for the residence permit for an employed person. This is the largest work-based residence permit scheme, containing half of the applications submitted in 2019. The processing in this scheme includes the partial decision given by an Employment and Economic Development Office (TE Office). The applications that include a partial decision or statements from another authority might take longer to process (Table 1)²⁸.

For a residence permit based on work, the applicant needs to earn their living. The earned salary must correlate with the salary specified in a collective agreement that

²⁷ Työ- ja elinkeinoministeriön julkaisuja (2018): Työnteon perusteella myönnettävien oleskelulupien käsittelyn pullonkauloja koskeva esiselvitys. Loppuraportti. Owl Group. Available in: <http://urn.fi/URN:ISBN:978-952-327-341-2>

²⁸ Finnish Immigration Service Applications, available in: <https://migri.fi/en/working-in-finland/applications>

applies to the employment relationship. The minimum salary without any collective agreement in the sector is 1 236 € per month. This amount is revised annually. Specialists and EU Blue Card applicants must earn a higher salary than other applicants. Au pairs, volunteers and working holiday applicants have a separate requirement for income²⁹.

All applicants must meet the general requirements for entering Finland legally:

- A passport valid throughout the permit time.
- No prescribed prohibition of entry.
- The applicant is not a danger to public order or security.
- The applicant is not a danger to public health.
- The applicant is not a danger to Finland's international relations.

Table 1. shows the top 11 work-related residence permit schemes and the amount of decisions made 2019 in more detail. These schemes received 97% of the applications submitted in 2019. The largest category is the residence permit for an employed person, which had 6435 permit decisions made 59% of which were positive. Approximately half of the work permit decisions made by the Finnish Immigration Service fall into this scheme³⁰.

²⁹ Finnish Immigration Income Requirements, available in: <https://migri.fi/en/working-in-finland/income-requirement>

³⁰ Finnish Immigration Service Statistics 2019, available in: <https://tilastot.migri.fi/#decisions?l=en&start=588&end=599>

Table 1: work-related residence permit schemes

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
1. Residence permit for an employed person	<p>The residence permit for an employed person is processed in two stages. The permit requires a partial decision from an Employment and Economic Development Office (TE Office). First, the TE Office concludes the labour market testing and ensures that the terms and conditions of the employment relationship comply with the Finnish labour law and collective agreements. Second, the Finnish Immigration Service makes the final decision on the permit.</p> <p>The applicant must have a signed contract of employment or must have accepted a binding job offer. The employer must confirm this information by filling in the form TEM 054.</p> <p>Health care professionals need a permission to practise their profession from Valvira, the National Supervisory Authority for Welfare and Health. The processing time for the authorization is 3–4 months³².</p> <p>Electronic application fee: 490 €. Paper application fee: 640 €.</p>	<p>3827 positive</p> <p>2608 negative</p>	<p>1–4 months (e-application)</p> <p>2–4 months (paper application)</p>
2. Entrepreneur	<p>Entrepreneurs usually need to enter their business in the Trade Register maintained by the Finnish Patent and Registration Office before a permit can be granted.</p> <p>The application will be processed in two stages. First, a Centre for Economic Development, Transport and the Environment (ELY Centre) will make a partial decision to see if the business is profitable. After this, the Finnish Immigration Service will process the application.</p> <p>The applicant must be a self-employed person, whose business is one of the following:</p> <ul style="list-style-type: none"> - a private trader, i.e. a private entrepreneur - a partner in a general partnership - a general partner (not a silent partner) in a limited partnership 	<p>128 positive</p> <p>271 negative</p>	<p>5–9 months (e-application)</p> <p>8–10 months (paper application)</p>

³¹ The right to work starts after the permit is granted, unless otherwise mentioned.

³² The National Supervisory Authority for Welfare and Health (Valvira), Professional Practice Rights, available in: https://www.valvira.fi/web/en/healthcare/professional_practice_rights

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
	<p>- a member of a cooperative, who has an unlimited liability for refinancing</p> <p>- an entrepreneur in a limited liability company</p> <p>The applicant must not only own, but must also work in the company.</p> <p>Electronic application fee: 490 €. Paper application fee: 640 €.</p>		
3. Start-up entrepreneur	<p>A start-up entrepreneur must get a positive Eligibility statement from Business Finland before the residence permit can be applied for and granted. The statement can be applied for online and the processing time is approximately 1 month³³.</p> <p>The applicant must also have secure means of support for at least one year. Sufficient resources are a monthly sum of 1000 € on a bank account or a secure salary. If there are more resources available, the permit can be granted up to 2 years.</p> <p>Electronic application fee: 350 €. Paper application fee: 480 €.</p>	<p>35 positive</p> <p>9 negative</p>	<p>2–4 months (e-application)</p> <p>3–5 months (paper application)</p>
4. Specialist	<p>To apply as a specialist the applicant must work with expert tasks that require special expertise (highly skilled worker). A higher education degree is required.</p> <p>The applicant must have a signed contract of employment or must have accepted a binding job offer.</p> <p>Gross income must be at least 3 000 € per month. For the duration of a one-year residence permit it is approximately 36 000 €. In some exceptions, the salary may be lower and compensated with fringe benefits³⁴, but a higher education degree is always required.</p> <p>If the applicant is submitting the permit from Finland, they can work as a specialist before the residence permit is granted. In this case, there must be a valid visa and the maximum time to work is 90 days³⁵.</p>	<p>1893 positive</p> <p>10 negative</p>	<p>1 month (e-application)</p> <p>1–2 months (paper application)</p>

³³ Business Finland, Finnish Startup Permit, available in: <https://www.businessfinland.fi/en/do-business-with-finland/startup-in-finland/startup-permit/>

³⁴ The Finnish Immigration Service, Specialist residence permit, available in: <https://migri.fi/en/specialist/en>

³⁵ The same applies to those who come from the visa free countries

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
	Electronic application fee: 410 €. Paper application fee: 560 €.		
5. EU Blue Card	<p>The applicant must have a higher education degree and the tasks must require special professional qualifications or expertise.</p> <p>The applicant must have a signed contract of employment or must have accepted a binding job offer for at least a year.</p> <p>The gross income limit is a minimum of 4 852 € per month. The permit can be granted for two years.</p> <p>Electronic application fee: 410 €. Paper application fee: 560 €.</p>	<p>160 positive</p> <p>3 negative</p>	<p>1 month (e-application)</p> <p>2 months (paper application)</p>
6 Scientific Research (Includes two different applications: Scientific Research and Researcher)	<p>Scientific Research The applicant is going to conduct scientific research, but has not completed a Master's degree. The legal relationship between the applicant and the research organisation is usually not an employment relationship³⁶.</p> <p>Also, there needs to be an invitation from the research organisation / an agreement with the research organisation regarding the applicant's research.</p> <p>If the applicant is applying for a residence permit from Finland, they can work before the residence permit is granted. There must be a valid visa³⁷ and the maximum time is 90 days.</p> <p>The e-service is not available for this application. Paper application fee: 520 €.</p> <p>Researcher The applicant is coming to Finland to conduct scientific research, to study for a Licentiate's degree or to prepare a doctoral dissertation. The applicant must have a doctoral degree or a second-cycle</p>	<p>1032³⁹ positive</p> <p>11 negative</p>	<p>Scientific Research 4–7 months (paper application)</p> <p>Researcher 1–2 months (e-application) 2–3 months (paper application)</p>

³⁶ The legal relationship can also be an employment relationship. There must be a contract between the researcher and the organisation. The nature of the agreement will determine what the legal relationship is.

³⁷ Or the applicant is allowed to stay in Finland without a visa.

³⁹ These numbers include both schemes – scientific research and researcher, which became its own permit type in the fall of 2018. The Finnish Immigration Service combines these two schemes in their statistics. Most of the decision numbers fall within the researcher scheme, which is more commonly used.

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
	<p>degree, which gives them access to doctoral programmes. Also, they must have been selected by a research organisation and must have been admitted to the territory of an EU Member State to carry out a research activity for which at least a second-cycle degree is normally required.</p> <p>A research organisation must have signed a hosting agreement with the applicant.</p> <p>Applicants that are in an employment relationship must be paid according to the collective agreement or, if there is no collective agreement, a minimum salary of 1 236 €.</p> <p>If the applicant is not in an employment relationship, they must have a monthly sum of 1 000 €, at least 12 000 € for the year, at their disposal. Applicants, who plan to do research for two years and who have at least 24 000 € at their disposal, are granted a two-year permit.</p> <p>If the applicant submits the residence permit application from Finland, they are allowed to work as a researcher before the residence permit is granted. There must be a valid visa³⁸ and the maximum time to work is 90 days.</p> <p>Electronic application fee: 410 €. Paper application fee: 560 €.</p>		
7. Seasonal work	<p>Seasonal work is described as work that is done during certain seasons in the fields of agriculture and tourism and lasts 3–9 months. The Finnish Immigration Service has a detailed online list of seasonal jobs⁴⁰. The applicant must have a signed contract of employment or must have accepted a binding job offer and appropriate accommodation.</p> <p>The applicants that work less than 3 months, apply for the seasonal work application. Picking berries does not require a seasonal work permit. Instead, a visa from the Finnish embassy is required or another type of legal stay.</p>	1577 ⁴¹ positive 45 negative	1 month (e-application) 2 months (paper application)

³⁸ Or the applicant is allowed to stay in Finland without a visa

⁴⁰ The Finnish Immigration Service, What Counts as Seasonal Work. Available in: <https://migri.fi/en/what-counts-as-seasonal-work->

⁴¹ 1091 positive and 37 negative for Seasonal work and 486 positive and 8 negative for seasonal work that requires a partial decision from an Employment and Economic Development Office (TE Office).

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
	<p>Work that will last for 6–9 months will be processed in two stages. First, an Employment and Economic Development Office (TE Office) will do the labour market testing and ensure that the terms and conditions of the employment relationship comply with the Finnish labour law. Second, the Finnish Immigration Service makes the final decision.</p> <p>Family members of seasonal workers cannot get a residence permit in Finland based on family ties.</p> <p>Electronic application fee: 3–6 months 410 € 6–9 months 490 €.</p> <p>Paper application fee: 3–6 months 560 € 6–9 months 640 €.</p>		
8. Sports and coaching	<p>To apply as an athlete or a coach, the activity must be full-time and on a professional level. There must be a signed player agreement or an employment contract with a sports club or a similar organisation.</p> <p>If the residence permit is applied for in Finland, the applicant may work as a coach, referee or player before the permit is granted. There must be a valid visa⁴² and the maximum time is 90 days.</p> <p>Electronic application fee: 410 €. Paper application fee: 560 €.</p>	<p>284 positive</p> <p>75 negative</p>	<p>1–3 months (e-application)</p> <p>2–4 months (paper application)</p>
9. Internship	<p>A residence permit for internship is issued for a maximum period of 18 months. The internship must not replace a job and must be paid according to the collective agreement or the sum must be at least 1 236 € per month in sectors without a collective agreement.</p> <p>There must be a signed employment contract containing the principal conditions and terms of employment, e.g. the salary.</p> <p>Electronic application fee: 410 €. Paper application fee: 560 €.</p>	<p>159 positive</p> <p>4 negative</p>	<p>1 month (e-application)</p> <p>2 months (paper application)</p>

⁴² Or the applicant is allowed to stay in Finland without a visa

Permit	Short description ³¹	Amount of decisions in 2019	Average processing times (first permit)
10. Intra-corporate transfer (ICT)	<p>The applicant must be transferred internally (ICT) to Finland within a company or a group of companies to work as a manager, specialist or trainee employee. If the applicant is working as a manager or specialist, the maximum transfer time is 3 years. As a trainee, the applicant must have a higher education degree and must be transferred for a maximum time of one year.</p> <p>Electronic application fee: 410 €. Paper application fee: 560 €.</p>	6 positive	3 months (for both)
11. Volunteering	<p>There are two paths to apply for volunteering, depending on the organiser. A voluntary service scheme of the EU or another organisation that runs volunteer programmes, such as through AIESEC.</p> <p>There must be evidence of sufficient funds for the duration of the voluntary work and an agreement of volunteering with the organisation responsible. Maximum volunteering time is one year.</p> <p>EU organisation Electronic application fee: 410 €. Paper application fee: 560 €.</p> <p>Non-EU organisation, only paper application Paper application fee: 520 €.</p>	6 positive	2 months (both)

The other work-related residence permit schemes have only a few or no permit decisions. Altogether, 2,6% of the applications submitted in 2019 belonged to these schemes.⁴³

The residence permit process is explained in more detail later through the specialist scheme. The professional or work characteristic requirements and requested attachments between different schemes vary and, in some schemes, a partial decision or statement is required. Nevertheless, the essential application process can be recognized.

⁴³ The Finnish Immigration Service, Statistics 2019, available in: <https://tilastot.migri.fi/index.html#applications/21205/59/2?l=en&start=588&end=599>

2.2 International students and researchers

Along with skilled workforce, international students and researchers are a focus in Finnish talent attraction. The scheme for scientific research is also mentioned in Table 1, since it is a part of the work-related residence permits classified by the Finnish Immigration Service.

Study permit

First residence permits granted for studies in 2019 had an 86% (5246) percentage of positive decisions. Most students coming to study in Finland are from China (15%), The Russian Federation (15%) and Vietnam (7%)⁴⁴.

In order to be granted a residence permit for studies, the applicant must be accepted to a higher education institution or other educational institution and the studies must usually lead to a degree or a vocational qualification. There can be some exceptions, such as special trainings that are available in Finland. The residence permit for studies is valid up to two years.

Other requirements for a study permit include sufficient means for living costs, which is 13 440 € for a two-year stay, and a mandatory private insurance for medical and pharmaceutical expenses. Evidence must also be presented in the application of necessary funds for tuition fees. Higher education institutions charge a tuition fee for students outside the EU/EAA region. In 2019, annual tuition fees in universities were around 8 000–18 000 €, depending on location and program⁴⁵. Annual tuitions in universities of applied sciences (Bachelor's degree) are usually between 5 000–12 000 €, depending on the school, location and program⁴⁶. Many students have scholarships to supplement the tuition fees that cover 10–100 % of the tuition fees. Some higher education institutes also have scholarships to compensate for living costs⁴⁷.

Much of the processing time in the Finnish Immigration Services is spent on investigating the sufficient means and the insurance coverage. If the applicant is applying for

⁴⁴ The Finnish Immigration Service, Statistics 2019, available in: <https://tilastot.migri.fi/index.html#decisions/21205/59/3?l=en&start=588&end=599>

⁴⁵ Comparison made with the University of Helsinki, the University of Jyväskylä, the University of Turku, the University of Oulu and the LUT University (Lappeenranta) from the year 2019.

⁴⁶ Comparison made with Metropolia amk (Helsinki), Jamk (Jyväskylä), Turku amk (Turku) Oamk (Oulu) and Lab (Lappeenranta) from the year 2019.

⁴⁷ Opetus- ja kulttuuriministeriö julkaisuja (2018) Kokemuksia lukuvuosimaksujen käyttöönotosta lukuvuonna 2017–2018 – seuranta- ja arviointiryhmän väliraportti. Available in: <https://minedu.fi/-/valiraportti-eu-maista-tulevien-opiskelijoiden-maara-kasvoi-eu-eta-alueen-ulkopuolelta-tulevien-maara-vaheni>

a two year permit, they must have insurance that covers medical treatment expenses for up to 120 000 € and medicine expenses for up to 40 000 €⁴⁸. Most of the applications are submitted between May and September, when 70% of all the study permit applications arrive, creating longer processing periods in the Finnish Immigration service and Finnish missions abroad^{49 50}.

The narrow application time during the summer creates challenges for this residence permit type. The applicant first needs to be accepted to a higher education institute and will be informed of this between April and June. Most of the applications are submitted in June and July, giving the Finnish missions and the Finnish Immigration Service a short time to receive and process the applications. One problem recognized in the permit process is the fact that the applicants do not immediately initiate the residence permit process. A reform has been implemented for a joint application system in 2020, concerning students coming from abroad. This reform makes it possible to receive information on being accepted as early as in February. The Finnish missions and the Finnish Immigration Service would need to know the number of incoming students approximately six months before the processing time in the summer begins. Without systematic information sharing, the challenge is to reserve sufficient resources in advance. The Finnish Immigration Service has allocated more resources to student permits in the summer, making the average processing time only 19 days. The processing time is longer, if the application lacks information and the applicant must be contacted for more information. After the permit has been granted, the applicant receives the residence permit card in a Finnish mission approximately 2–3 weeks after the decision has been given. The majority of Student permits (97 %) are submitted in the e-service Enter Finland⁵¹.

After the residence permit has been granted, students can do degree related work. The right to do other types of work is restricted to 25 hours per week during academic terms. If the student has a spouse or children, they may apply for a residence permit on the basis of family ties.

⁴⁸ Opetus- ja kulttuuriministeriö julkaisuja (2019) Kansainvälisten korkeakouluopiskelijoiden maahantulo ja integroituminen sujuvaksi yhteistyöllä. Available on: <http://urn.fi/URN:ISBN:978-952-263-659-1>

⁴⁹ Työ- ja elinkeinoministeriön julkaisuja (2018): Työnteon perusteella myönnettävien oleskelulupien käsittelyn pullonkauloja koskeva esiselvitys. Loppuraportti. Owl Group. Available in: <http://urn.fi/URN:ISBN:978-952-327-341-2>

⁵⁰ Opetus- ja kulttuuriministeriö julkaisuja (2019) Kansainvälisten korkeakouluopiskelijoiden maahantulo ja integroituminen sujuvaksi yhteistyöllä. Available in: <http://urn.fi/URN:ISBN:978-952-263-659-1>

⁵¹ Opetus- ja kulttuuriministeriö julkaisuja (2019) Kansainvälisten korkeakouluopiskelijoiden maahantulo ja integroituminen sujuvaksi yhteistyöllä. Available in: <http://urn.fi/URN:ISBN:978-952-263-659-1>

Processing times for a submitted application vary from 1–3 months via electronic application (a fee of 350 €) to 4–5 months via paper application (a fee of 450 €).

Scientific research

In 2019, residence permits granted for scientific research and researcher were 99% (1032) positive. The most common permit receiving nationalities were Chinese (33%), Iranian (12%) and Indian (10%)⁵². The researcher scheme became its own residence permit scheme in the fall of 2018 and the Finnish Immigration Service combines these two schemes in their statistics. Most of the decision numbers fall in the researcher scheme, which is more commonly used.

The requirements in the scientific research scheme include the following: the applicant must be conducting scientific research in Finland, the highest degree must be a Bachelor's degree and the legal relationship between the applicant and the research organization is usually not an employment relationship^{53 54}. Also, there needs to be an invitation from the research organization or agreement with the research organization regarding the applicant's research.

If the application is submitted from Finland, the applicant can work before the residence permit is granted. There must still be a valid visa, or the applicant is allowed to stay in Finland without a visa, and the maximum time to work is 90 days.

Only paper applications may be submitted in this scheme. The researcher scheme is a permit category much more often applied for and, therefore, already uses the e-service option. The processing time is 4–7 months and the processing fee is 520 €.

⁵² The Finnish Immigration Service, Statistics 2019, available in: <https://tilastot.migri.fi/index.html#decisions/21205/59/2?l=en&start=588&end=599>

⁵³ Applicants, who already have a Bachelor's degree and an employment relationship with the research organisation, can apply for the residence permit scheme Work in the field of science, culture or arts.

⁵⁴ If the legal relationship is an employment relationship, there must be a contract between the researcher and the organisation. The nature of the agreement will determine what the legal relationship is.

Research

The requirement for applying for the researcher scheme is to come to Finland to conduct scientific research, to study for a Licentiate's degree or to prepare a doctoral dissertation. The applicant must have a doctoral degree or a second-cycle degree that gives them access to doctoral programmes. Also, they must have been selected by a research organisation and must have been admitted into the territory of an EU Member State to carry out a research activity for which at least a second-cycle degree is normally required. A research organization must have signed a hosting agreement with the applicant.

Researchers have income requirements based on how they earn their living in Finland. Those who are in an employment relationship must be paid according to the collective agreement or, if there is no collective agreement, a minimum monthly salary of 1 236 €. The minimum is revised annually. If the applicant is not in an employment relationship, they must have a monthly sum of 1 000 €, at least 12 000 € for the year, at their disposal. This can be secured with funds, earnings from work or a scholarship. Applicants who plan to do research for two years and who have at least 24 000 € at their disposal are granted a two-year permit.

If the applicant submits the residence permit application from Finland, they are allowed to work as a researcher before the residence permit is granted. There must be a valid visa, or the applicant is allowed to stay in Finland without a visa, and the maximum time to work is 90 days. After the permit is granted, employment can include work from another field, but the research work has to continue full-time.

Processing times for the application vary from 1–2 months with an electronic application (a fee of 410 €) to 2–3 months with a paper application (a fee of 560 €).

Research work completed in Finland

Researchers, who have finished their research work in Finland and whose main basis for staying is work, can apply for this scheme. A signed employment contract or a binding job offer is required. There is no time limit to submit the application so several years can pass between finishing the research and applying.

For the residence permit, the applicant needs to earn a living. In an employment relationship, they must be paid according to the collective agreement or, if there is no collective agreement, a minimum monthly salary of 1 236 €. The minimum is revised annually.

Processing times for the application varies from 2–3 months with an electronic application (a fee of 410 €) to 3–4 months with a paper application (a fee of 560 €).

A degree completed in Finland

In order to be granted the residence permit, the applicant must have studied and completed their degree in Finland and the main basis of their stay must be work. A signed employment contract or a binding job offer is required. There is no time limit to submit the application and, therefore, several years can pass between receiving the degree and applying.

For the residence permit, the applicant needs to earn a living. In an employment relationship, they must be paid according to the collective agreement or, if there is no collective agreement, a minimum monthly salary of 1 236 €. The minimum is revised annually. The right to work begins when the permit is granted and it includes all fields of work.

Processing times for the application vary from 2–3 months with an electronic application (a fee of 410 €) to 3–4 months with a paper application (a fee of 560 €).

2.3 Application forms and fees

There are 23 different work-related residence permits for applicants from outside the EU/EEA countries. If the applicant doesn't find a certain application suited for their profession or work description, they must apply for a residence permit for an employed person, which includes the partial decision of an Employment and Economic Development Office (TE Office).

The Finnish Immigration Service's processing fees range from 400 € to 600 €, depending on the scheme and how the application is submitted. In general, an e-application in the e-service Enter Finland usually costs around 150 € less than an application submitted on paper. Most of the applications can be submitted on both paper and in the e-service. The applicants are encouraged to use the e-services that have more economical processing fees and processing times that can be months faster. The employer can submit information regarding the work and the company and pay for the application costs in the e-service. In chapter 2.1, the work-related residence permit

schemes presented in Table 1. demonstrated the processing times and fees in more detail⁵⁵.

Enter Finland receives most of the applications from high skilled workers or students. Most of the applications in the e-service come from students (97%), researchers (90%) and specialists (88%). The largest scheme, residence permit for an employed person, amounts to only a 53% share of the applications coming into the e-service. Around half of all the applications the Finnish Immigration Service receives are submitted in the e-service. These also include EU-registrations, Finnish nationality applications and extended permit applications.

The residence permit process starts after the applicant has submitted the payment, concluded the identity verification and has presented original copies of attachments in a Finnish mission abroad or at the Finnish Immigration Service, when applying in Finland. If the application type needs to be changed during the process, the applicant must cancel the ongoing process and submit a new application. If the attachments need to be translated into English, the applicant is responsible for the translation and its costs.

The residence permit process starts even if the application is submitted incomplete, e.g. missing attachments or lacking information. In this case, the Finnish Immigration Service contacts the applicant for more information and the processing time can be prolonged significantly. In fact, incomplete applications are commonplace, since approximately 70% of the applications of the most commonly used scheme, the residence permit for an employed person, are submitted incomplete. Over 60% of first residence permits are submitted in a Finnish mission. This can lead to long waiting times, as the applicants must schedule appointments in a mission to submit the application, provide identification and undergo possible interviews.⁵⁶

2.4 The application process: The specialist scheme

The specialist scheme received 14% of all work-based residence permit applications in 2019, making it the most used high skilled work scheme. It also has a high permit

⁵⁵ Finnish Immigration Service Applications, available in: <https://migri.fi/en/working-in-finland/applications>

⁵⁶ Vuokko, Honkavaara, Siira, Pahkala (2019) Maahantuloprosessien kehittäminen sekä automaatiikan, robotiikan ja tekoälyn hyödyntäminen.

granting rate, since 99% of the applications processed in 2019 resulted in positive decisions. Most of the permits in 2019 were granted to applicants from India (1083), The Russian Federation (219) and China (129). The work permit scheme for specialists is predominantly used by men (80%)⁵⁷.

Even though Finland does not have a regulated fast track model⁵⁸ for a work-based residence permit, the specialist scheme might be considered a somewhat faster track to receive the permit. The expected processing time for a first residence permit in the Finnish Immigration Service is 1–2 months, depending how the application is submitted. The processing time begins from identity verification and ends when the decision has been made by the Finnish Immigration Service.

Requirements for the specialist scheme are working as a specialist or as a teacher with a higher degree. IT experts, experts who have a higher education degree from a field of specialization and those with a higher education degree, whose work requires expert knowledge, can apply through the specialist scheme. Gross income must be at least 3 000 € per month, so, for the one year permit, the income must be approximately 36 000 €. In certain cases, taxable benefits provided by the employer can be included into the salary. If the applicant meets all the requirements except the income, they will have to apply through the residence permit for an employed person scheme, where the approximate processing time is 1–4 months. The applicant can get consultation and guidance before applying from the Finnish Immigration Service. Most of the information can be found online. All residence permit applicants must meet the general requirements for entering Finland legally, e.g. they must have a valid passport for the duration of the permit time.

The specialist residence permit process step-by-step:

1. **The employee applies for the permit.** Residence permits are always applied for personally.
2. **The employment contract.** There must be a confirmed contract of employment to Finland. The employer usually confirms the employment with the employment contract form.
3. **Legalizing and translating required attachments** that are not in Finnish, Swedish or English. The applicant is responsible for acquiring the translation and for its costs.
4. **Submitting and paying for the specialist residence permit application.** The applicant can do this either on paper or in the e-service Enter Finland.

⁵⁷ The Finnish Immigration Service, Statistics 2019, available in: <https://tilastot.migri.fi/index.html#decisions/21205/59/2/232?l=en&start=588&end=599>

⁵⁸ There is currently e.g. no certified employer scheme in Finland

- Submitting the application on paper requires the applicant to do so at a Finnish mission, embassy or consulate abroad. The Finnish mission will then send the application to the Finnish Immigration Service either by post or digitally. If the applicant is already in Finland and has a valid visa, they can submit the application at the Finnish Immigration Service.
 - The applicant must pay the application fee of 410 € for the electronic application or of 560 € for the paper application. The payment can be done online in the e-service or at a Finnish mission. If the application is submitted from abroad, the applicant cannot come to Finland to wait for the decision.
 - The expected residence permit processing time is 1 month for the electronic application and 1–2 months for the paper application. In the specialist scheme, 88% of the applications are submitted in the e-service.
 - When the permit is submitted in the e-service, the employer can submit information regarding the work and the company and can pay for the costs on behalf of the applicant. The employer can also authorize a third party to represent them in the e-service.
5. **Attachments** of the residence permit should be submitted at the same time as the application. It is possible to submit the application without all of the attachments, but this will prolong the processing time. The attachments are divided into general and applicant-specific attachments.

General attachments:

- A valid passport (to be presented when submitting the application)
- A passport photo
- Colour copies of the passport page with personal data and copies of all passport pages that have notes
- A document showing the applicant is legally staying in the country where they are submitting the application
- Applicants already in Finland fill a form of their legal stay in the country

Applicant-specific attachments:

- A certificate that includes the main terms and conditions of employment or consultancy agreement
- A certificate of fringe benefits from the employer
- A commission agreement with a Finnish client, if the employer is a foreign company without an office in Finland
- A job description
- A certificate of a higher education degree

6. **Identity verification and presenting original copies of attachments.** The applicant must book an appointment at the embassy or consulate to verify their identity, give fingerprints and present the original copies of

any attachments required for the application. Waiting for the appointment might take several weeks, even months. Both paper and e-service applications require the physical step of going to the embassy or consulate abroad or, if already in Finland, the Finnish Immigration Service.

After identification, the counting of the processing time begins.

Missing attachments and incomplete applications will lengthen the processing time.

7. **Processing time in the Finnish Immigration Service.** The processing time is usually affected, if the application is missing attachments, the application lacks information or if the Finnish Immigration Service must contact the applicant for further information or schedule an interview in a Finnish mission. If the application has been submitted through the e-service, the processing stage of the application can be monitored by signing into the service.

The specialist application is faster compared to the most common scheme, the residence permit for an employed person. This is because the specialist scheme does not include labour market testing and does not require any other two-step processing between authorities. The whole decision process is completed in the Finnish Immigration Service. Most of the applicants submit their applications online, which also quickens the processing time.

8. **The decision on the residence permit.** If the application has been submitted through the e-service, the notification of the decision will come via email or text message and can be seen on the applicant's user account in the e-service. If the application has been submitted on paper, a Finnish mission will inform the applicant of the decision. In some cases, the decisions will be sent by post with delivery advice. Applicants already staying in Finland will receive the decision from the police or the Finnish Immigration Service by post. The employer is also informed of the decision.

This is when **the counting of the processing time ends.**

9. **The residence permit card.** The residence permit card is delivered to the applicant's country, if the application was submitted abroad. The card will then be provided through an embassy or consulate. The residence permit card will be received approximately **4 weeks** after the decision. This includes 2 weeks of ordering and manufacturing the card at about 2 weeks to receive it abroad. **This time is not included into the**

processing time. The residence permit card contains biometric identifiers, such as a facial image and two fingerprints, the period of validity, the permit type, the extent of the card holder's right to work, the Finnish Immigration Service customer number and the renewal date of the card. For security matters, the card must be renewed every 5 years.

The residence permit card is also connected to the personal identity code. After the Finnish Immigration Service has granted the permit, the applicant's personal information is also automatically recorded into the Finnish Population Information System. The personal identity code is crucial, because it is required with public authorities, employers and, for example, when opening a bank account.

10. **The right to work.** The applicant can start working as a specialist before the residence permit has been granted, if they have applied for the permit in Finland. This requires staying in the country with a valid visa or the applicant is allowed to stay in Finland without a visa. The right to work continues without interruption, if the permit has been applied for and granted within 90 days.

The employer and the applicant observe the entire duration of the application process, while the approximate processing time is calculated between the steps of identification and the decision from the Finnish Immigration Service. There are several identified bottlenecks during the process that are described in more detail later.

The specialist scheme's processing length has had positive feedback. Some of the critique is related to a lack of information concerning bringing family members with the applicant and scheduling an appointment for biometric identification in a Finnish mission. Sometimes employers have had specialists come to Finland in order to start the permit process while already in the country. This procedure is possible with a 90-day tourist visa and to those who come from the visa free countries. The applicant can start work immediately and can begin the practical preparations to bring their family members. There has been discussion on whether this should be the normal procedure for the specialist scheme in order to attract more talents to the country⁵⁹.

⁵⁹ Työ- ja elinkeinoministeriön julkaisuja (2018): Työnteon perusteella myönnettävien oleskelulupien käsittelyn pullonkauloja koskeva esiselvitys. Loppuraportti. Owl Group. Available in: <http://urn.fi/URN:ISBN:978-952-327-341-2>

2.4.1 Family members of skilled worker permits

Family members of the residence permit applicant, referred to as a sponsor, must apply for their permit in the family member scheme. Without a residence permit, family members with a visa⁶⁰ can stay for a maximum of 90 days. The sponsor cannot apply on behalf of their family members.

The definition of family members can vary. By Finnish law, a family member is someone leading a family life with the sponsor and is: a spouse, a registered partner, a cohabiting partner, a guardian of a child under 18 or a child. There is a separate application for couples in a dating-type relationship called the residence permit application on the basis of an intimate relationship. The application type for family members depends on the relationship with the sponsor and why the sponsor is staying in Finland, i.e. Finnish citizenship, a residence permit or asylum.

Usually, the sponsor must have secure means to support their family. The amount of income depends on the size of the family. A family with two adults and two children under 18 needs to have 2600 € per month. A family with two adults, one child over 18 and one under 18 needs to have 2900 € per month. Certain social benefits, such as child benefit and housing allowance, lower the required means of support⁶¹.

Family members can submit their applications together with the sponsor. In this case, all residence permits will be processed simultaneously. Every family member must apply for a permit separately and every family member over 6 years of age will have their fingerprints taken for the residence permit card when submitting the application⁶².

When your spouse has a residence permit in Finland, the residence permit application based on family ties has an expected processing time of 4–8 months with a 470 € fee when applied for in the e-service and a processing time of 9 months with a 520 € fee when applied for on paper.

In principle, the permit based on family ties must be applied for abroad and the decision must be waited for abroad. The residence permit card will be delivered to a Finnish mission. If the applicant comes to Finland before the permit has been granted and

⁶⁰ or members from a visa free country

⁶¹ The Finnish Immigration Service, Income requirement for family members. Available in: <https://migri.fi/en/income-requirement-for-family-members-of-a-person-who-has-been-granted-a-residence-permit-in-finland>

⁶² Maahanmuuttoviraston ohje (2018) Oleskelulupa työntekoa varten.

wants to receive the residence permit card in Finland, they have to submit a new application in Finland. Otherwise, they must get the permit card from the Finnish mission abroad⁶³. After the residence permit based on family ties has been granted, the applicant has the right to work and study.

2.5 Identified bottlenecks in the permit process and possible solutions to them

The residence permit process involves various authorities. The Finnish Immigration Service processes and grants all the permits. The planning of the operations and finances of the Finnish Immigration Service follows guidelines confirmed by the Ministry of the Interior. The authorities that give a partial decision or statement, i.e. the Employment and Economic Development Offices (TE Office), the Centres for Economic Development, Transport and the Environment (ELY Centre) and Business Finland, are all under the regulation of the Ministry of Economic Affairs and Employment. The Finnish missions, embassies and consulates abroad are under the regulation of the Ministry of Foreign Affairs. All of these authorities are involved in granting residence permits and must be also involved in all development and legislative reforming.

The most significant bottlenecks concern submitting incomplete applications and processes, where other authorities are included in granting the permit. The length of the waiting time is longer when there are different actors included in the process. In recent years, the discussion on developing the permit process has involved arguments for strengthening the role of the employer, automatization, more agile identification, entering the country with a D-visa and the possibility to conduct remote interviews. The consensus on reforming the residence permit lies in making all the work and study permit schemes simpler and cutting the processing time in every scheme to only one month⁶⁴. This has already been started in the Ministry of Economic Affairs and Employment with a legislative reform project and a project to automatize the permit process.

The bottlenecks of the Finnish permit process have been researched in detail during the recent years⁶⁵. Reforming and automatizing the process is essential, since approximately 70% of the applications in the most commonly used residence permit for

⁶³ Maahanmuuttoviraston ohje (2018) Oleskelulupa työntekoa varten.

⁶⁴ The Ministry of the Interior, Finland Invests in Labour Migration. Available in: <https://intermin.fi/en/areas-of-expertise/migration/labour-migration>

⁶⁵ Työ- ja elinkeinoministeriön julkaisuja (2018): Työnteon perusteella myönnettävien oleskelulupien käsittelyn pullonkauloja koskeva esiselvitys. Loppuraportti. Owl Group. Available in: <http://urn.fi/URN:ISBN:978-952-327-341-2>,

an employed person scheme are submitted incomplete and over half of them are submitted on paper.

1. Incomplete applications and guidance

Currently, it is possible to submit an incomplete application to start the residence permit process in the Finnish Immigration Service. Incomplete applications often result from not receiving all the information needed to apply. The guidance and information given before submitting the application is scattered in different places and between different authorities. Employees and employers have had trouble contacting the Finnish Immigration Service and the Employment and Economic Development Office (TE Office) for information to apply for the residence permit. Guidance for employers with an immigrant background can be challenging, because service and information is given mainly in Finnish, Swedish or English.

The Finnish Immigration Service has started using automatization and filtering on the submitted applications to keep better track on the legal processing times. These procedures have also led to improved processing times. The office has focused more resources into processing seasonal work permits, residence permits for an employed person and specialist permits. Since 2019, the Finnish Immigration Service has concentrated on making information and guidance clearer for students, employers and employees. There is an ongoing reform of forms to simplify the attachments needed for work-based residence permits. With these reforms, the Finnish Immigration Service wishes to decrease the amount of incomplete applications.

2. Paper applications

Paper applications are more frequently missing or lacking needed information than e-applications. With the residence permit for an employed person, half of the applications are submitted on paper. In some cases, the Finnish missions, instead of scanning the applications into the UMA information system, send them to the Finnish Immigration Service by post. Again, this might make the process longer.

The applicants are led to use the e-service with guidance, a promise of faster processing times and lower processing fees. Paper applications cannot be completely replaced with e-service, since all applicants are not familiar with using online services

Sisäministeriö (2019) Ulkopuolinen asiantuntijanäkemyks työntekijöiden perusteella myönnettävien oleskelulupien käsittelyn nopeuttamisesta. Raportti, Owl Group.
Vuokko, Honkavaara, Siira, Pahkala (2019) Maahantuloprosessien kehittäminen sekä automatiikan, robotiikan ja tekoälyn hyödyntäminen.

and, according to law, the paper application must exist as an alternative. Employers are also not using the e-service with significant frequency.

3. Identification and interviews abroad in a Finnish mission

The applicant must book an appointment at an embassy or a consulate to verify their identity, give fingerprints and present original copies of any attachments required for the application. In some cases, they must also go to a Finnish mission for an interview to complement their application. These appointment times are sometimes difficult to receive, resulting in the applicant having to wait for a long period of time before even starting the permit process. Generally, the waiting time for interviews is approximately one month, but occasionally it has stretched up to 6 months. Over 60% of all the first residence permits are submitted in a Finnish mission. Possible family members applying at the same time must go through the same procedures.

Finnish missions do not operate under unified processes or guidance. The staff turnover in Finnish missions is quite high due to the Ministry of Foreign Affairs' job rotation system. This may lead to a somewhat unexperienced staff handling residence permits, who find it challenging to identify incomplete applications or gather all the needed information during interviews. Some Finnish missions do not scan the submitted documents into the UMA information system and they must be delivered by post to the Finnish Immigration Service.

To tackle these obstacles, the Finnish missions, together with the Finnish Immigration Service, have participated in the RIO project to conduct remote interviews. The core concept is that officials of the Finnish Immigration Service conduct remote interviews, especially in cases where in-depth knowledge of the profession is required or there is a higher risk of fraud. The officials of the Finnish Immigration Service possess more knowledge of granting permits, as the officials of the Finnish missions also have other duties, as well as a large staff turnover. The outcome has been controversial, since the Finnish immigration Service sees problems in the reliability of remote interviews, while the Ministry of Economic Affairs and Employment, along with the Ministry of Foreign Affairs, have had more positive reactions to it.

To concentrate more resources on the residence permit interviews and identification tasks, some of the Finnish missions have outsourced the application receiving process to a third party. The end of the permit process, receiving the residence permit card, has been made more agile, since it is also possible to send the card straight to the applicant's address.

4. Partial decisions and statements from another authority

Some residence schemes need a partial decision or statement from another office. For the Residence permit for an employed person scheme, an Employment and Economic Development Office (TE Office) will do the labour market testing and ensure that the terms and conditions of the employment relationship comply with the Finnish labour law and collective agreements. After this partial decision, the Finnish Immigration Service makes the final decision. The entrepreneur scheme is also processed in two stages. First, a Centre for Economic Development, Transport and the Environment (ELY Centre) will make a partial decision to see if the business is profitable before the Finnish Immigration Service makes the final decision. For start-ups, there must be a positive Eligibility statement from Business Finland before making the application and granting the permit.

If the authority making the partial decision has several applications lined up, the processing is delayed. Information missing from the application prolongs the process even more. Both the Finnish Immigration Service and the Employment and Economic Development Office (TE Office) may request information from the same employer and it is sometimes information they could get more efficiently by asking other authorities, e.g. the Finnish Tax Administration, directly.

Submitted applications might wait long in the Employment and Economic Development Office (TE Office). If they are lacking information that should have been on the application while submitting it abroad, the processing time is even longer. The UMA information system can be used to pre-screen incoming applications into different categories, such as filtering by salary, the collective labour agreement or the starting date of employment. The automatized pre-screening process enables the creation of filters for categorizing the applications when they are received. An efficient pre-screening process requires correctly filled incoming applications.

The Employment and Economic Development Offices (TE Office) in the Uusimaa region, which is the most populated region in Finland, have focused on improving the guidance given to the employers. The offices have simplified the contact channels and developed new online information for employers on the TE Office website. An ongoing reform aims to simplify the attachments required for the residence permit for an employed person. The regional structure policy of the whole labour market screening process is under unification and development by the Ministry of Economic Affairs and Employment.