

Conclusions and recommendations of the National Audit Office

Management of immigration matters by the authorities and developing the process

The aim of the audit was to determine how well the official tasks concerning immigration have been managed in the administrative branches of the Ministry of the Interior and the Ministry for Foreign Affairs. The audit covered the Ministry of the Interior and the Finnish Immigration Service and the Finnish Border Guard, two agencies coming under the ministry's purview, as well as the Ministry for Foreign Affairs and Finland's missions abroad. During the period covered by the audit there was not yet any sign of the rapid increase in the number of asylum seekers in the second half of the year 2015.

When examining the issues concerning asylum and residence permits, the auditors focused on the process itself. Priority was given to factors that make efficient processing of matters and access to reliable information more difficult. In these matters, as in other aspects concerning the combating of illegal immigration, the main aim was also to assess the effectiveness of cooperation between the authorities.

Visa processing reform has been a success

Outsourcing of the visa application reception process in 2010 and the introduction of a location-independent visa processing system in 2013 have substantially improved customer service and made the work more efficient. Cost-effectiveness of visa processing increased until 2014 when a steep fall in the demand for visas in Russia led to a substantial decline in visa revenue. The Ministry for Foreign Affairs should, however, sharpen the steering and supervision of visa processing in Finnish missions abroad.

The planned outsourcing of the reception of residence permit applications and representation arrangements will allow the missions to operate more effectively and make it easier to redirect resources from the above tasks to core duties. At the same time, however, it is also important to ensure that the Finnish authorities will continue to have direct access to the applicants and the essential information on them.

Finnish Immigration Service and police departments have introduced new practices for processing residence permits

Both the Finnish Immigration Service and police departments have rationalised permit processing by introducing new operating practices and by increasing team work, cooperation between the authorities and electronic transactions. For example, as a result of the new operating practices, the backlog of unprocessed applications concerning Somali citizens' family ties, which started accumulating in 2007, could be eliminated during 2014. Even though increased use of electronic services has already brought cost savings, there is still a great deal of development work to do concerning the use of electronic procedures. There are also many issues affecting processing times and the preparation of decisions that require legislative reforms and other measures.

These concern the carrying out of DNA tests, absence of assessment criteria for certain types of work (such as voluntary work), chances to react to suspected human trafficking, removal of a person from Finland and right to obtain information needed in the assessment of the income requirement from social welfare authorities and banks.

In addition to setting processing time targets for itself, the Finnish Immigration Service has also set out processing time targets for Finnish missions abroad and police departments (processing of residence permit matters) and for TE Offices (work permit matters). However, there is not yet any agreement on introducing the targets. Agreeing on joint targets and monitoring the time use by each of the authorities involved in the process is particularly important in connection with residence permits in which the maximum processing times are based on the law.

Processing of asylum applications has been speeded up in recent years

Cooperation with the police and a separate development project have been the main reasons why the Finnish Immigration Service has been able to speed up the processing of asylum matters. The asylum interviews, which normally take a great deal of time, have been shortened and streamlined, which in turn has also reduced interpretation costs. At the same time, however, processing times have been prolonged by delays in obtaining attorney and interpretation services which has also complicated court processes. The absence of qualification requirements for attorneys managing alien affairs has also caused problems.

According to the Ministry of the Interior, savings of about 16 million euros (20 per cent) were achieved in reception activities between 2011 and 2014. However, the number of applicants often changes within short periods of time and the fluctuations may be substantial, which makes it more difficult to implement and assess the savings. Transfers of clients between reception centres, delays in providing clients with notification of favourable decisions and the reluctance of municipalities to take refugees have all led to longer stays in reception centres. A substantial increase in the number of asylum seekers in 2015 has caused unprecedented problems in the processing of asylum applications and accommodation arrangements. As a result, there are growing pressures to resort to novel measures, which may also include limits on the number of asylum seekers.

There are many ways of improving effectiveness of the activities

The authorities have examined whether the management of immigration tasks could be rationalised by transferring some of the duties from the police to the Finnish Immigration Service. It is estimated in the memorandum of the working group reviewing the matter that the transfers could bring a wide range of different benefits. According to the memorandum, transferring the early stages of the asylum procedure to the Finnish Immigration Service would also have an impact on reception activities: If the clients could only submit asylum applications in a limited number of regional offices, the network of reception centres should also be overhauled in accordance with this regional organisation. However, it is crucial to ensure that the number of accommodation places can be rapidly adjusted in accordance with changes in demand.

More use should be made of the information produced by the Legal Service and Country Information Unit of the Finnish Immigration Service and the Finnish National Contact Point of the European Migration Network. At the same time, the processing of the information should also be improved. Introducing tools helping to promote immigration forecasts and beneficial immigration are particularly needed. The need for a centre of expertise should also be examined.

There is a substantial need for the development of an electronic system for processing immigration matters. There should be a reduction in the number of overlapping entries, while at the same time compatibility of the systems, functioning of direct links and access to information should be improved.

The Aliens Act should be overhauled and simplified. The act contains a number of provisions that in the authorities' view make their work more difficult. The Act on the Register of Aliens should also be updated.

The steering of immigration tasks should take place at group level and the process-based steering of the Finnish Immigration Service should be strengthened. The National Police Board should focus more on establishing national strategies. It should be examined whether the police are adequately trained in dealing with immigration matters.

Efforts to curb illegal immigration have been successful but risks are increasing

During the last few years, the authorities have been able to increase cooperation in the curbing of illegal immigration both inside and outside Finland's borders. Especially the immigration liaison officers posted in Finnish missions abroad have played an important role in this respect. In order to develop the activities, consideration should be given to sending itinerant liaison officers for short-term posts to Finnish missions for which the combating of illegal immigration is particularly relevant.

An arrangement in which the authorities are automatically notified of the prohibition of entry imposed by other countries would help to make decision-making in Finland more effective. The Finnish authorities should also be able to prohibit persons staying in other countries from entering Finland.

There should be more exchange of information concerning the eligibility for entry of residence permit applicants between Finnish missions abroad and the Finnish Immigration Service. It is essential that both parties agree on the content, amount and type of the information that is needed in the decision-making.

One way of trying to enter a country illegally is to use a forged application and the forgery often involves the documents attached to the application. Continuous improvements in forging techniques also increase the risk that officials fail to notice forged documents when receiving and processing applications. For this reason, it is essential that the officials processing the documents receive adequate training so that they can maintain and improve their professional skills. The new training plan of the Ministry for Foreign Affairs will provide a partial response to this need. The tools used by the officials should also be kept up-to-date.

Outsourcing the reception of applications may involve the risk of illegal immigration because checking the original documents will, as a rule, be the responsibility of the service centre staff. When carrying out quality controls at its private service provider, the Ministry for Foreign Affairs should also consider risk management from this perspective.

A sudden increase in the number of refugees in Europe has also put additional pressures on the controls at the external borders of the Schengen Area, which requires more extensive cooperation between EU Member States at Union level.

Recommendations of the National Audit Office

1. In the reforming of the Aliens Act and the Act on the Register of Aliens, consideration should be given to the need for legislative improvements highlighted in the audit report.
2. Management of immigration matters should be reorganised by changing the division of tasks between the Finnish Immigration Service and the police.
3. Steering of immigration matters should be developed at group level.
4. The use of information and information systems serving the activities and decision-making should be developed.
5. There should be binding agreements on residence permit processing times between the authorities involved.