

Work-based immigration

Effectiveness and
customer orientation
of the immigration
administration and
recruitment of foreign
labour in the health and
social services sector





Performance audit report

Work-based immigration

Effectiveness and customer orientation of the immigration administration and recruitment of foreign labour in the health and social services sector

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Audit report of the National Audit Office of Finland



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The National Audit Office of Finland has conducted the performance audit ‘Work-based immigration - Effectiveness and customer orientation of the immigration administration and recruitment of foreign labour in the health and social services sector’. This audit is included in the audit plan of the National Audit Office. The audit was carried out in accordance with the guidelines on compliance audit, performance audit and fiscal policy audit issued by the National Audit Office.

Based on the audit, the National Audit Office has issued an audit report, which will be submitted to the Ministry of Economic Affairs and Employment, Ministry of the Interior, Ministry of Social Affairs and Health, Ministry for Foreign Affairs, Ministry of Education and Culture, Ministry of Finance, Finnish Immigration Service, National Supervisory Authority for Welfare and Health (Valvira), Digital and Population Data Services Agency (DVV) and Statistics Finland. The report will also be sent for information to the Parliamentary Audit Committee, Parliamentary Finance Committee, Parliamentary Education and Culture Committee, Parliamentary Social Affairs and Health Committee, Parliamentary Committee for the Future, Parliamentary Employment and Equality Committee and the Government Financial Controller’s Function.

Before the issuing of the audit report, the Ministry of Economic Affairs and Employment, Ministry of the Interior, Ministry of Social Affairs and Health, Ministry for Foreign Affairs, Ministry of Education and Culture, Ministry of Finance, Finnish Immigration Service, National Supervisory Authority for Welfare and Health, Digital and Population Data Services Agency and Statistics Finland were provided with an opportunity to check that the report does not contain any factual errors and give their views on the conclusions and recommendations presented by the National Audit Office in the report.

In the audit follow-up, the National Audit Office will determine which measures have been taken on the basis of the conclusions and recommendations presented in the audit report. The follow-up will take place in 2025.

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Conclusions and recommendations of the National Audit Office

The audit looked into authorities' actions and administrative processes associated with work-based immigration. A particular aim was examining if the processes are efficient and customer oriented and if cooperation between the authorities is effective. This examination focused specifically on the health and social services sector, which is affected by a major labour shortage but in which little or no action has been taken to promote work-based immigration.

Finland's population and the number of employed can only increase through immigration. According to the Ministry of Finance, a permanent increase in work-based immigration by 10,000 people a year would, over the longer term, reduce the sustainability gap by about 0.5 percentage points in relation to the gross domestic product (GDP), or more than one billion euros. Since 2003, Finnish Government Programmes have referred to promoting work-based immigration as a means of improving the demographic dependency ratio, bolstering the economy, and alleviating the situation in sectors suffering from labour shortages.

While measures to promote work-based immigration are heading in the right direction, progress has been slow on many fronts

Numerous strategic development targets at the government level have been set to promote work-based immigration over the last 20 years. While the authorities' actions have been steered consistently to achieve the targets, target achievement has been hampered by slow progress and interruptions. Among other things, problems have been caused by the fragmented administrative structures of official actions and variations in different authorities' commitment to the targets. In addition, grassroots level development measures have largely relied on project funding, which has been an obstacle to long-term development.

In 2020, the administration of work-based immigration was transferred to the Ministry of Economic Affairs and Employment. Whereas this has improved the overall steering and promoted target achievement, there is still room for improvement in the effectiveness and customer orientation of immigration administration.

The Government has set the target of doubling work-based immigration from its current level by 2030, making it possible to attain the total increase of at least 50,000 work-based immigrants identified as the requirement in the sustainability roadmap. After this, the target will be to increase the number of immigrants by at least 10,000 a year. The preconditions for achieving the targets set for work-based immigration include more streamlined permit processes for workers and entrepreneurs as well as closer co-operation between the authorities. The central government, local governments and business life should also work together to improve immigrants' language skills and professional competence. Work-based immigration could also be promoted more efficiently if, rather than funding individual projects, fragmented resources were allocated to actions and structures that safeguard permanent preconditions for entry.

Specialists' and growth entrepreneurs' permit processes meet the target time, employees' and entrepreneurs' processes do not

Slow permit processes have been a significant reason for the low number of foreign employees recruited by Finnish companies. The Ministry of Economic Affairs and Employment has made determined efforts to develop the permit processes since the administration of work-based immigration was transferred to the Ministry. Among other things, the permit processes have been speeded up by introducing automation, using risk-based processing of applications and increasing the human resources of the Finnish Immigration Service.

Permits for specialists and growth entrepreneurs are processed within two weeks set as the target. The Ministry of Economic Affairs and Employment is striving to accelerate the permit process for specialists even further using a fast track service pledge and the national D visa associated with it, which entered into force in June 2022. The audit found, however, that additional administrative measures and an assessment of the cost-benefit ratio are prerequisites for the full introduction of the D visa. According to Finnish missions abroad, only a fraction of the specialists applied for a D visa in the first months after it became available, and no great increase in this share is expected.

The permit processes for employees and entrepreneurs comprise two steps, which slows them down. A TE Office or a Centre for Economic Development, Transport and the Environment first make a partial decision before the Finnish Immigration Service makes its decision. In July 2022, the average processing time of residence permits for an employed person was 68 days, while this figure for entrepreneurs was 85 days. Employees' permits to enter the country do not apply to their families, which makes family reunification slow, expensive and uncertain for employees. As employers cannot promise potential employees that they can bring their families to Finland, targeting campaigns at employees to attract them is difficult. Specialists' family members usually receive a residence permit decision faster and simultaneously with the sponsor.

There is room for further improvement in the permit and service system's customer orientation

Guidance and advisory services for immigrants who arrive in Finland to work should be improved further. Customers still find it difficult to obtain information on the progress of the residence permit process. The agencies have improved the customer orientation of their approach. In a survey conducted in connection with this audit, however, companies and projects working with work-based immigration highlighted the need for further improvement in the customer orientation of the Finnish Immigration Service and the Digital and Population Data Services Agency, in particular.

Several measures intended to improve the customer orientation and efficiency of the permit system are proposed as part of reforming Chapter 5 of the Aliens Act (301/2004). They include more extensive outsourcing of permit-related tasks, remote hearings of applicants and certification of trusted employers. The audit findings indicate that more extensive guidance and monitoring by the Ministry for Foreign Affairs would be needed to outsource residence permit tasks. While ten missions have already outsourced residence permit tasks, not all of them find the outsourced activities completely satisfactory. Remote hearings may improve customer orientation and efficiency if the Finnish Immigration Service and the Ministry for Foreign Affairs can work together smoothly.

Gaps remain in the knowledge base of work-based immigration

In an audit carried out as far back as 2012, the National Audit Office found that data concerning the grounds for issuing residence permits cannot be combined with other national register data. This prevents the compilation of statistical data on work-based immigration and makes it problematic to produce monitoring, foresight and research data. The audit findings indicate that this key issue associated with the knowledge base of work-based immigration has not been solved over ten years. While efforts are currently being made to solve the knowledge base issues through various development measures, co-operation between different authorities remains a precondition for ensuring that comprehensive statistical data are collected.

The Ministry of Social Affairs and Health has played a minor role in anticipating the need for foreign labour in the health and social services sector, even if the Government has set the ministry several targets associated with foresight activities as part of strategic steering over the past decade. The ministry sharpened its focus in late 2021 as it launched a cross-administrative programme to ensure the adequacy and availability of personnel in the health and social services sector.

Work-based residence permits for a profession requiring legalisation cannot be issued directly to health and social services professionals trained outside the EU and EEA

While work-based immigration has long been considered a partial solution to labour shortages in the health and social services sector, it does not provide a fast remedy for the prevailing situation. Professionals who have completed their health and social services sector training in an EU or EEA country, or non-EU and EEA countries, cannot be issued directly with an employee's residence permit for professions requiring legalisation in this sector, as they must first obtain a right to practise their profession issued by the National Supervisory Authority for Welfare and Health (Valvira). The audit findings indicate that, in addition to the residence permit process, the processes of granting professional practice rights should also be speeded up.

Valvira may require the applicant to complete compensatory measures or additional studies before they are granted the right to practise their profession. However, there is no path to obtaining the proper qualifications for trained nurses in the health and social services sector. Attempts have been made in recent years to build a qualification path for nurses in several projects. No permanent funding for such qualification training has been found, however, which is why efforts to develop this training are continued with the support of project funding. Another precondition for obtaining the right to practise the profession is submitting a certificate of sufficient language proficiency to Valvira. However, the legislation does not specify what sufficient language proficiency means. A sub-group of the programme for improving the adequacy and availability of health and social services personnel has been tasked with presenting its proposals concerning the funding of training for the legalisation of foreign labour and preparing an action plan for developing and putting on a permanent footing both the legalisation process and the qualification training that supports it. The National Audit Office finds performing this task extremely necessary.

International recruitments are handled by recruitment companies operating in the health and social services sector. There is currently no legislation directing or regulating international recruitment activities in Finland. Consequently, it is the recruitment companies that make the rules for the recruitment market in the health and social services sector. Recruitment companies in this sector bring persons with a background in nursing from countries outside the EU and the EEA to Finland to work as care assistants and practical nurses. Care assistants do not need professional practice rights granted by Valvira, and a person who has not completed practical nursing training can also work in this role if the employer finds that they have sufficient training, experience, professional skills and language proficiency for the task in question. Some of the recruits are trained as practical nurses in Finland through apprenticeship training because it is not possible to be trained as a nurse under an apprenticeship agreement in Finland. While the authorities and experts find this operating method unethical, it is, however, the only way to recruit international workers directly to the Finnish health and social services sector.

Recruitment companies in the health and social services sector currently bring into the country people whose language proficiency would not meet the requirements set by Valvira for nursing professionals who have completed their training abroad and who have been legalised and issued the right to use a protected occupational title. It is up to the employer to ensure that the employee has sufficient language proficiency required in a healthcare professional's work. However, it is rarely necessary to intervene in the right of persons who have completed healthcare training abroad to practise the profession, and these cases usually involve a lack of clinical competence rather than language skills.

Large cities invest in settling-in services for work-based immigrants but smaller municipalities do not have established services

According to the Parliamentary Audit Committee, integration services for immigrants who come to Finland to work should be improved. The audit found that instead of organising integration measures, large cities have helped work-based immigrants to settle in Finland by providing authority services at guidance and advisory points intended for immigrants following the one-stop shop principle.

The integration of work-based immigrants can be enhanced by defining the parties responsible for settling-in services and their roles more accurately and by improving cooperation between central and local government authorities. In addition, electronic identification should be introduced in all services associated with entry into Finland. Integration and settling-in services offered to work-based immigrants should also be strengthened and put on a permanent footing outside the largest cities. Services that promote integration and settling in Finland are a pull factor for the country and help ensure that work-based immigrants and their families stay in Finland. Studies have found that investing in integrating immigrants is highly profitable for society.

Recommendations of the National Audit Office

Based on the audit, the National Audit Office recommends that

1. the gaps in the knowledge base of work-based immigration be investigated and filled in, ensuring that in the future, data describing the grounds for issuing a residence permit can be combined with other national register data. The authorities responsible for this are the Ministry of Economic Affairs and Employment, the Ministry of the Interior and the Ministry of Finance as well as the Finnish Immigration Service, the Digital and Population Data Services Agency and Statistics Finland as agencies subordinate to them.
2. permanent practices, knowledge bases and organisation be created for anticipating competence and labour needs in the health and social services sector. They should be based on the on-going programme for ensuring the adequacy and availability of health and social services personnel and government policies on developing the national foresight system. The authorities responsible for this are the Ministry of Social Affairs and Health, the Ministry of Education and Culture and the Ministry of Economic Affairs and Employment.
3. the authorities responsible for permit processes invest in streamlining the permit processes not only for specialists but also for employees and entrepreneurs as well as their family members and in developing customer orientation further. The authorities responsible for this are the Ministry of Economic Affairs and Employment, the Ministry of the Interior, the Ministry for Foreign Affairs and the Finnish Immigration Service.
4. the Finnish Immigration Service develop its customer service regarding guidance and advice provision for employers and applicants for an employee's residence permit, for example by disseminating information about the agency's upgraded telephone service more efficiently and by assigning a contact person for companies that recruit foreign workers to answer enquiries and provide additional information.
5. when the Ministry of Social Affairs and Health and the Ministry of Education and Culture assess the need to develop legislation on the recruitment of foreign labour, the ministries should also consider more detailed provisions to be included in the section on language proficiency and the level of language proficiency required in today's health and social services sector tasks.

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1 Scope of the audit

The Government has set the target of doubling work-based immigration from its current level by the year 2030 so that the total increase of at least 50,000 work-based immigrants identified as the requirement in the sustainability roadmap can be achieved. After this, the target is to increase the number of immigrants by at least 10,000 each year.³

A total of 12,126 first residence permits were granted on the basis of work between January and September 2022.⁴ A total of 11,428 such permits were granted in 2021⁵ (Figure 1). Most of the permits were granted to Ukrainian, Russian and Filipino nationals. The number of EU citizens registered on the basis of work has also increased, totalling 5,333 in 2021. Estonian nationals accounted for more than one third of this group.⁶

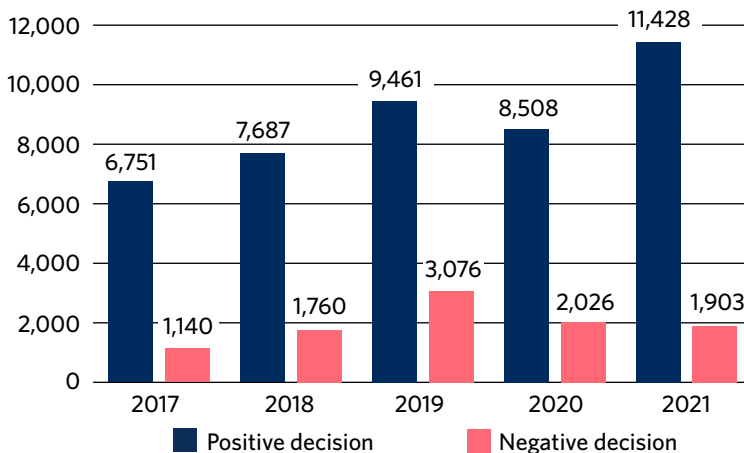


Figure 1: First decisions on work-based residence permits, 2017-2021.

Source: Finnish Immigration Service and European Migration Network.

The following issues were examined in the audit: measures taken and objectives set by the government agencies, efficiency and customer orientation of the administrative processes and the functioning of the inter-authority cooperation in the field of work-based immigration. The focus was on the health and social services sector, which is facing a severe labour shortage but where little has been done to boost work-based immigration. It is estimated that by the year 2035, about 200,000 new employees are needed in the Finnish health and social services sector.⁷

The two overall audit questions were as follows:

1. Have government agencies developed and carried out their activities in the field of work-based immigration in accordance with the objectives set and so that immigrants can enter Finland without undue delays?
2. Have measures been taken to ensure an efficient and customer-oriented permit and service system for work-based immigration?


The audit material was collected during 2022 and the auditors examined the permit processes between January 2021 and July 2022. The long-term measures taken by government agencies were also examined as many of the objectives set out in the road map for work-based immigration and in the Programme of Prime Minister Sanna Marin's Government have been discussed at least since the term of Prime Minister Juha Sipilä's Government. The objectives listed in these documents were used as the audit criteria.

The Finnish population and the number of employed persons in our country are only growing because of immigration. The dependency ratio in Finland is rising at a significantly more rapid rate than in other Nordic countries. A decrease in working-age population is widening the sustainability gap. The Ministry of Finance has estimated that an increase of 50 per cent in net immigration (7,500 persons) would narrow the sustainability gap by 0.4 percentage points if the immigrants could find work as easily as the resident population.⁸ In the longer term, a permanent increase in work-based immigration by 10,000 persons each year would narrow the sustainability gap by about 0.5 percentage points (more than one billion euros) in relation to the gross domestic product.⁹

In Government Programmes, promoting work-based immigration has been seen as an instrument for improving the demographic dependency ratio, boosting economic growth and easing the situation in sectors facing labour shortages. Macroeconomically, immigration also has positive impacts on innovations, investments and commodity markets. Diverse and skilled workforce is a factor attracting international investments.¹⁰ The topic is also significant from the perspective of central government finances as the shortage of skilled labour is a serious obstacle to growth. Finland is the OECD country facing the most serious shortage of highly educated labour. The Ministry of Economic Affairs and Employment estimates that the shortage of skilled workforce prevented the creation of 65,000 jobs in 2019.¹¹

In its mid-term review in spring 2021, the Government earmarked EUR 61 million for boosting work-based immigration, and EUR 44 million of this sum was allocated to the purpose as a permanent appropriation.¹² The appropriations are divided between the administrative branches of the Ministry of the Interior, Ministry of Economic Affairs and Employment and (for education-based immigration) the Ministry of Education and Culture. The Ministry of Economic Affairs and Employment will also coordinate the investment in digital immigration infrastructure between 2021 and 2024. The funding for the investment comes from RRF as part of the EU recovery package and a total of EUR 20 million will be allocated to the purpose.¹³

2 Have government agencies developed and carried out their activities in the field of work-based immigration in accordance with the objectives set?



As a rule, the promotion of immigration and the activities of government agencies in this field have been steered on a consistent basis but the progress towards the objectives has been slow and sporadic. The fragmented nature of the government efforts and the fact that not all government agencies are equally committed to the achievement of the objectives have been seen as problems. Moreover, development work at grassroots level has largely relied on project funding, which has slowed down long-term development.

There are still significant inadequacies in statistics on work-based immigration even though correcting them has been a national objective for many years. It is still impossible to combine data on the grounds for residence permits with other national register data, which prevents the comprehensive compilation of statistics on work-based immigration. The audit revealed that there has been no active foresight work on labour needs in the health and social services sector in recent years.

2.1 While the measures to promote work-based immigration are heading in the right direction, progress has been slow on many fronts

Work-based immigration is promoted and steered by a large number of government agencies and other actors

In Finland, work-based immigration is promoted on a cross-administrative basis. The administration of work-based immigration is structured in a multifaceted manner and it consists of a large number of administrative branches and government agencies. It is steered by the Government in accordance with its policy decisions and the objects set out in the Government Programme. (Figure 2.)

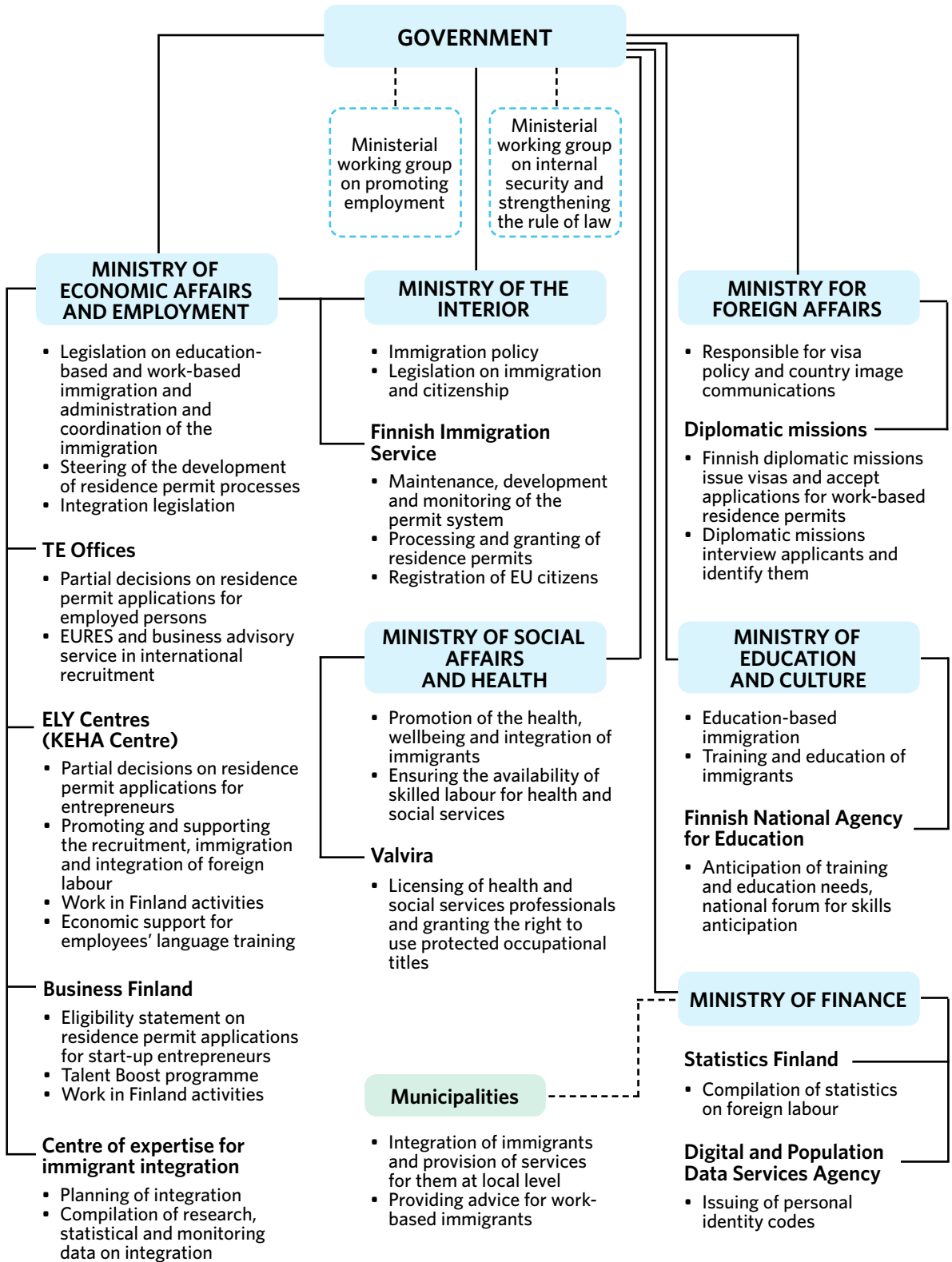


Figure 2: Administration of work-based immigration.

It is difficult to form a comprehensive picture of the resources allocated to the promotion of work-based immigration

The Talent Boost programme is currently the key central government instrument for promoting work-based immigration. Under Budget proposals, about EUR 64 million has been allocated to Talent Boost activities for 2022 and about EUR 62 million for 2023. These figures also include most of the EUR 20 million investment aid funded from the EU Recovery and Resilience Facility (RRF), which is divided over a period of four years. Some of the investment aid has been earmarked for system development and communications aimed at speeding up education-based and work-based permit processes.

The national Talent Boost funding is divided between three different administrative branches. Talent activities, Talent Explorer funding and Talent Hub activities of Business Finland, establishment of the Work in Finland structure and implementation of the international recruitment model have been the most important activities in the administrative branch of the Ministry of Economic Affairs and Employment to promote work-based immigration. Between EUR 2 and EUR 4.5 million in appropriations were allocated to each of these activities for 2022. In the administrative branch of the Ministry of the Interior, the focus in the field of work-based immigration has been on reducing the applications backlog in the Finnish Immigration Service, automation and the development of information systems. About EUR 12 million in appropriations was allocated to these activities for 2022. Some of the funding comes from the RRF.¹⁴ Finland's foreign affairs administration has also made significant inputs in the promotion of work-based immigration. For example, it received about EUR 7 million in RRF funding for 2022, and this sum is divided between the development of the Virtual Finland service platform and information system solutions (OLEDIGI).¹⁵

In addition to the Talent Boost programme, other measures to promote work-based immigration have also been taken. For example, some of the two million euros appropriated to the Ministry of Social Affairs and Health for the programme to ensure the supply of health and social services personnel (TAE 2023) has been allocated to promoting the supply of foreign labour. Work-based immigration is also promoted with EU project funding. The official duties of government agencies also include tasks in the field of work-based immigration. In addition to central government, local government also provides funding for promoting work-based immigration at local level.



Just over EUR 60 million has been allocated to Talent Boost measures each year.

A large number of development targets and projects have been introduced to promote work-based immigration over the past two decades

Work-based immigration has played a key role in Government and public administration target setting during the last two decades. The need for work-based immigration was highlighted in the Programmes of Prime Minister Anneli Jäätteenmäki's Government in 2003 and the Government of Prime Minister Matti Vanhanen, its successor.¹⁶

The focus in *Maahanmuuttopoliittinen ohjelma* (Immigration policy programme) published in 2006 was on promoting work-based immigration and on preparing for the expected problems of labour supply. The programme was prepared in response to the anticipated changes in the demographic structure and labour market that were seen as leading to a labour shortage in the 2020s. Health and social services were mentioned as a critical sector in this respect. According to the programme, the ad hoc nature of the qualification training for health care personnel and inadequate opportunities for language studies significantly hamper the recruitment of immigrants living in Finland and of health care professionals from outside Finland.¹⁷

The aim of the Second Government of Prime Minister Matti Vanhanen¹⁸ was to formulate an active and consistent immigration policy in which consideration should also be given to the need for foreign labour. In the *Työvoiman maahanmuuton toimenpideohjelma* (Action plan for labour migration) published in 2009, the focus was on promoting work-based immigration and preparing for labour supply problems. The proposals set out in the document concerned the development of responsibilities of and cooperation between government agencies and ensuring clearly structured funding for promoting work-based immigration. Developing and safeguarding the knowledge base and monitoring of work-based immigration were also set as goals in the action plan.¹⁹

Under the action plan, the Ministry of Social Affairs and Health was expected to start developing the recruitment of health care professionals. The aim was to determine how and from which countries health care personnel could be successfully recruited, considering the requirements for the right to practice a profession, qualifications and language proficiency. Assessing the recognition of qualifications obtained outside Finland and reviewing the need for legislative changes were seen as the most urgent tasks of the ministry.²⁰



In 2006, attention was paid to the inadequacies in the qualification path of foreign health care experts.



In 2009, the Ministry of Social Affairs and Health was tasked with developing and promoting recruitment of foreign labour for health and social services.

Prime Minister Jyrki Katainen's Government published the strategy *Maahanmuuton tulevaisuus 2020* (Future of immigration 2020) in 2013. The strategy, based on the Programme of the Government, outlined Finland's immigration policy for the 2020s and according to the document, immigration of skilled labour must be promoted by anticipating the need for labour and by creating a basis for targeted recruitments outside Finland. The emphasis in the strategy was on the need to clarify the division of labour and responsibilities in the immigration administration and on a more effective cross-administrative approach. The strategy also called for better access to and usability of statistics and research data on immigration.²¹

An action plan clarifying the strategy followed in 2013. It specified key development priorities and set out the responsibilities and resources in this area. Under the action plan, the Ministry of Finance, Ministry of Economic Affairs and Employment and Statistics Finland were expected to prepare a proposal for a comprehensive system for monitoring work-based immigration and compiling statistics on it. The purpose of the system was to produce foresight information on the need for foreign labour in strategic sectors. Under the action plan, health and social services, the largest of the sectors in terms of workforce, were expected to develop and model international recruitment and the cooperation required for it. The Ministry of Social Affairs and Health was also expected to draft a recommendation for ethical guidelines for international recruitment in health and social services.²²

The aim of the action plan was also to harmonise the service processes for work-based immigration in different parts of Finland and to introduce a procedure by November 2014 in which the personal identity code would be issued with the first residence permit. However, it was estimated that the practical measures necessitated by the action plan in different sectors of work-based immigration would not require substantial spending. The view was that most of the work set out in the action plan would be carried by government agencies as part of their official duties or the administrative costs were simply characterised as insignificant.²³

In 2018, the Ministry of the Interior published the immigration policy programme of Prime Minister Juha Sipilä's Government under the title *Work in Finland – Government Migration Policy Programme to Strengthen Labour Migration*.²⁴ The programme was prepared alongside the programme *Talent Boost – international talent boosting growth* launched in 2017.



The 2013 action plan listed a large number of objectives but only limited resources were allocated to achieving them.

The themes listed in the immigration policy programme of 2018 were largely the same as in the previous programmes. A strategic, proactive and active work-based immigration policy was set out as the key objective. At the same time, the aim was to integrate work-based immigration into business and innovation policies as well as into the employment, education and training policies. As part of the practical implementation, the programme described a range of different aims at general level, such as the key role of foresight information, smooth functioning of the permit and integration system and the government role in the support for and steering of recruitment. Customer orientation was also given a high priority in the immigration policy programme.²⁵

The Talent Boost programme presented in 2020 is a key policy document specifying and steering work-based immigration on the basis of the goals set out in the Programme of Prime Minister Sanna Marin's Government.²⁶ Priority in the programme is on the sectors facing a shortage of labour and on the specialists, students and researchers essential for RDI activities.²⁷

The development priorities for work-based immigration discussed in the 2020s have been the same as in previous decades

The road map for education-based and work-based immigration²⁸ published in 2021 brought together measures to promote and steer work-based immigration. The document was prepared as part of the Talent Boost programme and the work was coordinated by the Ministry of Economic Affairs and Employment and the Ministry of Education and Culture.

The strategic objectives set out in the document concern the efforts to make Finland more interesting and attractive, to enhance the immigration experience and to boost international expertise. According to the road map, the objectives can be achieved by creating permanent structures and providing adequate resources to promote immigration at all levels of public administration. At the same time, funding should also be channelled to cooperation and long-term development of the service system. Exchange of information between government agencies and compatibility of systems should be developed by introducing legislative changes and new technical solutions.²⁹

There are substantial similarities between past steering and the latest policy document promoting work-based immigration on a country-wide basis. Most of the objectives have been discussed before and the target groups have also remained the same. For example, the work to develop knowledge management, compilation of statistics and foresight activities has continued for more than a decade. Likewise, the development of education and training continua has been a standard theme in work-based immigration for the last 15 years.³⁰



The 2018 programme again highlighted smooth permit processes, customer orientation and the role of foresight information.



Many of the themes set out in the 2021 road map had already been listed in earlier steering documents.

Work-based immigration has been steered on a consistent basis but progress towards the objectives has been slow

It emerged in the audit that in overall terms, work-based immigration has been steered in a consistent manner: it is seen as an objective that all parties should share and the commitment is on a cross-administrative basis. At the same time, however, long-term steering has remained a set of upper-level objectives and progress towards them has been slow and sporadic. This is highlighted by the fact that the objectives are repeated in a large number of documents setting out national goals and strategies.

The fact that the responsibility for developing education-based and work-based immigration and for drafting the relevant legislation has been transferred to the Ministry of Economic Affairs and Employment has helped to clarify and streamline steering and implementation in the sector. Before that, the responsibilities for promoting work-based immigration were not clearly set and realistic resources were not allocated to the implementation of the targeted measures.³¹ As a result, measures that were otherwise considered desirable were given low priority by individual actors.³²

Even though the transfer of the responsibilities to the Ministry of Economic Affairs and Employment was only completed relatively recently, most of the officials interviewed for the audit were of the view that it has helped to speed up the promotion of work-based immigration and given it concrete content. Major improvements have been achieved in the residence permit process under the auspices of the Ministry of Economic Affairs and Employment. Likewise, in the steering of the Finnish Immigration Service, business and employment policy issues are now examined from an entirely new perspective.³³

The complex and constantly changing operating environment of the immigration policy has slowed down the implementation of the long-term objectives. In recent years, in addition to focusing on the development of immigration processes, the Finnish Immigration Service has also been forced to channel resources to the management of immigration triggered by humanitarian and other factors. For example, it had to react to the refugee crisis of 2015 and as result of the coronavirus pandemic, it has been forced to deal with the problems arising from the mobility and identification of temporary labour. In the latest development, the agency has been forced to urgently process applications for temporary protection submitted by persons fleeing the war in Ukraine.³⁴



Transferring the responsibility for the steering of work-based immigration to the Ministry of Economic Affairs and Employment has helped to streamline the steering and implementation process.

In the strategic objectives for work-based immigration, health and social services have been identified as a sector facing a particularly severe shortage of labour. Since 2006, the national-level steering documents have listed a wide variety of different objectives to boost the supply of foreign labour in health and social services. They have concerned such issues as developing the international recruitment of health and social services professionals, recognition of foreign qualifications and the creation of paths for further training. According to the audit findings, the objectives set for the health and social services sector have not been achieved in the intended manner. A small number of projects have been carried out in Finland to create training paths for holders of foreign health care qualifications so that they can supplement their training. So far all these projects have come to an end because of the termination of funding. Moreover, the attempts to create national practices for permanent training paths have been unsuccessful.³⁵

The Ministry of Social Affairs and Health has not actively worked to anticipate the need for foreign labour in health and social services or promoted work-based immigration in recent years. The ministry's public officials are also of the view that it has played a secondary role in the development of work-based immigration.³⁶ Active efforts to promote work-based immigration as a solution to the staff shortages facing health and social services have been renewed in the programme on ensuring the adequacy and availability of health and social services personnel, which was launched at the end of 2021 under the auspices of the Ministry of Social Affairs and Health.³⁷

Coordinated action has been hampered by the fragmented nature of the administration of work-based immigration

Administering work-based immigration has been negatively impacted by a fragmented administration model and the fact that the development work is based on a large number of projects and action plans. The problems of administering the process have also been noted in government agencies. For example, according to the immigration policy programme presented by the Government in 2018, work-based immigration to Finland has taken place without comprehensive strategic planning and the public sector has not coordinated the direction of the recruitment, recruitment measures or the placement of the labour to be recruited in different sectors and occupations. It is also stated in the document that in the anticipation of labour needs, the role of foreign labour has not been separated from general labour needs, which has slowed down the preparation of an active labour migration strategy.³⁸



The targets set out for work-based immigration in health and social services have not been met.

In principle, there is a clear division of labour between the Ministry of the Interior and the Ministry of Economic Affairs and Employment in the administration of work-based immigration. In practice, a large number of issues have to be considered and the pace of development is rapid, which means that coordination between the two ministries is still needed. It emerged in the interviews conducted for the audit that when promoting matters, both ministries view them from their own perspectives, which still reflect the core tasks of the two ministries and differences between them. The underlying assumption set out in the Aliens Act, which is also the key principle guiding the administrative branch of the Ministry of the Interior, is that the minimum requirements and security aspects arising from immigration have priority. Incorporating this thinking into a smooth and quick permit process may create friction between government agencies and between the existing legislation and the entry process. The residence permit process for persons coming to Finland for work differs from the practices observed in many other countries. In Finland, the authorities make more thorough advance checks on the persons entering the country and a large number of administrative decisions are required.³⁹

It emerged in the audit that the existing legislation does not support the objective of streamlining work-based immigration in an optimum manner. The Aliens Act entered into force about two decades ago and it contains a large number of amendments and details that are difficult to interpret. Moreover, changes promoting work-based immigration often necessitate changes to the general provisions of the Aliens Act, making statute drafting more complicated. Consideration must also be given to the EU law and international agreements. According to the interviews conducted for the audit, the situation following the transfer of the administrative duties of work-based immigration has been a useful learning process. At times, statute drafting has progressed at a rapid pace and not all parties have been consulted in the process. After the completion of the process, the problems have been identified and measures have been taken to improve procedures by enhancing cooperation and exchange of information.⁴⁰

Coordination between general immigration policy and work-based immigration is also made more difficult by the existence of two upper-level policy steering structures. The ministerial working group on promoting employment steers the work-based immigration sector administered by the Ministry of Economic Affairs and Employment. At the same time, the immigration matters administered by the Ministry of the Interior are steered by the ministerial working group on internal security and strengthening the rule of law.



When promoting objectives, individual ministries view matters from their own perspectives.



Immigration policy is steered by two ministerial working groups.

As a result of these two steering channels and different areas of responsibility of the two ministries, experts in individual administrative branches and the persons drafting the matters are not always updated on background discussions, preparatory data and decisions. This slows down practical administrative work. New matters are often promoted in a hurry, which means that there is no time to discuss them or to share information on them across administrative boundaries. It is difficult to manage the system even though there is a great deal of cooperation to ensure coordination. Differentiating between work-based and other immigration is also difficult and partially impractical because such matters as family relations, permanent residence permits and citizenship are the responsibility of the Ministry of the Interior.⁴¹

National Talent objectives have been promoted with structures and resources of varying scope

There are substantial differences between regions in the role played by ELY Centres in the promotion of work-based immigration. All ELY Centres have tasks in the field of work-based immigration but no efforts have been made to steer all regions in a uniform manner. The ELY Centres for North Savo and Southwest Finland as well as the Uusimaa TE Office are responsible for a number of key tasks in the field of work-based immigration. Regional specialisation can be considered justified from the perspective of enhancing competence and expertise. However, making the ELY Centre for Uusimaa responsible for the processing of all matters concerning residence permits for entrepreneurs raised questions in other regions because as a result, only superficial assessments of local and regional operating prerequisites can be made in other regions.⁴²

Most of the ELY Centres responding to the information request sent as part of the audit were of the view that their responsibilities in the field of work-based immigration are wishes expressed at general level and no permanent resources have been allocated to ensure that the tasks can be carried out. Moreover, according to the ELY Centres, monitoring indicators can be characterised as qualitative statements on how matters should be developed.

From the regions' perspective, responsibilities for promoting work-based immigration and the coordination of the process should be clarified. Immigration is primarily promoted with project funding, which has been granted to regions for such purposes as EURES activities, ESF and Kokka projects, Talent Hub activities and Talent Boost development work. One region may receive funding from several sources: for example, from the Ministry of Education and Culture (for higher education) and from the Ministry of Economic Affairs and Employment (for Talent Hub activities). Such regions may have several full-time project workers. There are also regions where considerably less is spent on promoting work-based immigration and where the work is mostly carried out by public officials as part of their duties.



There are significant differences between regions in the development of work-based immigration and the practical support it receives.

There are considerable differences between regions in the resources allocated to the development and support of work-based immigration. This is partially because large cities (Talent Hubs) actively promote work-based immigration while at the same time, the role and inputs of ELY Centres also have an impact. However, the overall picture of ELY Centres as regional actors promoting and coordinating work-based immigration remains unclear. In fact, the ELY Centres also find it difficult to determine the scope of their tasks in the field of work-based immigration. KEHA Centres, which coordinate the activities of ELY Centres, are not responsible for tasks in the field of work-based immigration.⁴³

Business Finland is a key player in the implementation of the national strategic objectives for work-based immigration and the Talent Boost programme. The tasks of Business Finland concern country image work, attracting specialists to Finland and supporting the internationalisation of enterprises. In the road map for education-based and work-based immigration published in 2021, the scope of Business Finland's tasks was extended to cover support for sectors facing labour shortages. Similarly, under a more broad-based objective set out in the performance agreement between the Ministry of Economic Affairs and Employment and Business Finland for the period 2022–2025, Business Finland is expected to support companies and growth and internationalisation of RDI activities by attracting international talent to Finland.⁴⁴

It emerged in the interviews conducted for the audit that the focus of Business Finland's Talent Boost work is still on country image work, internationalisation of Finnish companies and efforts to attract specialists and start-up companies to Finland. Business Finland has also carried out service platform work (such as Finland Works, Work in Finland and Jobs in Finland). According to Business Finland's representatives, supporting the work to attract and recruit operational staff, such as health and social services experts, from other countries, is still largely the responsibility of TE Offices and ELY Centres.⁴⁵

In its performance management, national coordination of the Talent activities has also been specified as a Business Finland task. According to an estimate produced in 2020, Business Finland's role as a Talent coordinator has not been clear to all actors.⁴⁶ The officials interviewed for the assessment considered it important that work-based immigration should also be coordinated operationally so that the resources of the activities based on numerous actors and projects could be used efficiently.⁴⁷



The overall picture of ELY Centres as regional actors promoting and coordinating work-based immigration remained unclear.



Business Finland has its focus on country image work and attracting specialists to Finland.

Work-based immigration could be streamlined by combining resources and by developing the basic activities

Many of the experts interviewed for the audit⁴⁸ noted that even those who actively follow work-based immigration find it difficult to keep track of the development work under way in the field of work-based immigration and to identify all parties responsible for developing the activities. At the same time, the information requests sent to ELY Centres showed that extensive and regionally varied development work may have led to obscure organisational structures and even overlapping work.

In the interviews, project-based development work was criticised for being of short-term nature and regionally incoherent. In the projects, a great deal of time is spent on submitting applications and reports. Many of the projects are of short duration, in which case administrative work accounts for a large proportion of the effort and the continuity of the practices created in the projects cannot be ensured. At the same time, the overall resources allocated to the promotion and implementation of work-based immigration cannot be estimated as central and local government, educational institutions and organisations all organise activities on a project basis. According to the interviewees, most of the tasks in the field of promoting and supporting work-based immigration are on a permanent basis requiring specific processes, structures and operating practices to ensure that the entry of the immigrants into the country constitutes a uniform and logically administered process.⁴⁹

It is envisaged that as part of the TE services reform 2024, all international recruitment tasks will be brought under the Work in Finland activities, which would operate under the performance guidance of the Ministry of Economic Affairs and Employment. The function will be the joint responsibility of Business Finland and the KEHA Centre.⁵⁰ The reform, which will take effect in 2025, would bring some of the development work, which is now on fragmented basis, under a single organisation.

According to the audit findings, this is a desirable goal. When the new function is planned and implemented, it should also be determined how the practical aspects of international recruitment and work-based immigration are supported at regional and local level. In this, the focus should be on ensuring a clear division of responsibilities between central and local government and on clarifying the practical aspects of supporting immigrants. To promote work-based immigration, there is a need for permanent structures and operating models as well as concrete measures supporting the skills and language learning of immigrants and making public services more accessible.



The purpose of the TE services reform 2024 is to bring development work under a single organisation.

2.2 There are still inadequacies in the knowledge base of work-based immigration, making the production of monitoring, foresight and research data more difficult

The statistics on persons that have moved to Finland on the basis of work are still inadequate

It was noted in the performance audit on work-based immigration published by the National Audit Office in 2012 that no distinction between work-based and other immigration is made in statistics, research or in the Budget.⁵¹ The findings of the audit discussed in this report indicate that the problems concerning the knowledge base of work-based immigration remain. According to the audit findings, as a result of these inadequacies, it is still difficult to produce comprehensive statistics on work-based immigration. They also prevent assessments and research on the subject.⁵²

Even though information on different sectors of work-based immigration is supplied by many parties, there is no overall picture of this type of immigration. Statistics Finland produces data on population and employment and as part of it, differently categorised data on immigrants and integration. However, this information cannot be directly or comprehensively connected with the reasons for immigration as the data on the grounds for residence permits cannot be combined with the data kept in other national registers. Thus, no population-level data exists on the long-term employment of the persons that have moved to Finland on the basis of work or how many of them have stayed in Finland. Such information would be essential so that the achievement of the objectives of the promotion of work-based immigration could be assessed and work-based immigration could be monitored.⁵³ The inadequate knowledge base also makes it more difficult to anticipate and plan services in municipalities because municipalities do not receive any up-to-date information on immigrants moving to municipalities on the basis of work.⁵⁴

In the interviews conducted for the audit, the problems of combining information were described in a number of different ways. The fact that the personal identity code cannot always be issued in connection with the granting of the residence permit and the problems and delays in the retroactive updating of information were listed as key problems by the interviewees. Many of the interviewees also noted that even if the Finnish Immigration Service were in possession of the personal identity code or other information identifying the person, the agency does not actively share personal identity codes or develop them as a statistical key so that data kept in the registers could be combined. According to the Finnish



Persons that have moved to Finland on the basis of work are not shown as a separate group in statistics on foreign labour.

Immigration Service, the problems concerning the combination of data are also due to the Mahti legislation⁵⁵ on the immigration administration under which the information collected in the processing of residence permits may only be used in the administrative activities pertaining to the processing of the permits.⁵⁶

Under section 9 of the Act on the Population Information System and the certificate services of the Digital and Population Data Services Agency (661/2009), a personal identity code can be issued in connection with the granting of the residence permit and in same connection, information on the type and duration of the foreigner's residence permit can be entered in the Population Information System. Under section 22 of the same act, the Finnish Immigration Service is, as a rule, responsible for entering the information in the Population Information System. In connection with the saving of the information, the Finnish Immigration Service will, as a rule, obtain from the Population Information System the personal identity code issued to the person in question. Outside Finland, only a Finnish diplomatic mission may identify a person for the Population Information System. An external service provider used by the Ministry for Foreign Affairs may also identify a person for the processing of a residence permit application but not for the purpose of entering the information in the Population Information System.⁵⁷

When the identification of a person in a foreign country is performed by a party other than a Finnish diplomatic mission, the details of the person may not be entered in the Population Information System and the person in question cannot be issued with a personal identity code in connection with the granting of the residence permit. In such situations, the Digital and Population Data Services Agency or the Finnish Tax Administration will register the details of the foreign national in the Population Information System after the person in question has been granted a residence permit and entered Finland. Entering the details of a foreign national in the Population Information System may also fail for other reasons in connection with the granting of the residence permit. Problems usually arise when the details of the foreign national to be registered are compared with the details of the persons already in the Population Information System and it transpires that persons have already been registered in the Population Information System on the basis of identical or nearly identical data. In such cases, the Digital and Population Data Services Agency must ensure that the details of the person are entered in the Population Information System only once. If there is a risk that a person could be registered in the Population Information System more than once, the matter is examined more thoroughly and in such cases, the personal identity code cannot usually be granted in connection with the residence permit. In such cases, the person must visit a



The personal identity code cannot always be issued in connection with the granting of the residence permit.

service point of the Digital and Population Data Services Agency to obtain the personal identity code. There may also be other reasons preventing the entry of information in the Population Information System in connection with the residence permit decision, such as technical or human error but such cases are rare.⁵⁸

Some of officials interviewed for the audit also noted that government agencies have taken joint action to combine register data and that improvements are in sight. Statistics Finland and the Digital and Population Data Services Agency have been able to combine, once a year and to a limited extent, residence permit data with the data kept in the registries but there are also inadequacies in this data. The problem would be solved if the personal identity code would always be issued in connection with the granting of the residence permit. As a result, the grounds for granting the residence permit could be used as a source of registration statistics.⁵⁹

According to the Ministry of Finance, it is particularly important that the personal identity code could be entered in the case management system used by the Finnish Immigration Service to process immigration matters in situations where it is absent. If it is decided to correct the inadequacies by developing the right of residence data kept in the Population Information System, the development focus should be on ensuring that the right of residence data stored in the system is up to date and comprehensive. In practice, the right of residence data kept in the Population Information System should be comprehensively updated when the details of immigrants coming from outside the EU and the EEA are also entered in the Population Information System by parties other than the Finnish Immigration Service.⁶⁰ The developments will also be influenced by the work to update the system of personal identity codes, which is currently under way and one aim of which is to ensure that the personal identity code can already be issued when the residence permit application is being processed.⁶¹

In addition to the updatedness and combination of register data, the information inadequacies also concern the registration of temporary labour and the labour moving freely in the European Union. However, these problems are less serious because there is less need for statistical monitoring of persons moving freely than of those entering a country with the intention of becoming permanent residents.⁶² The most serious of the other information inadequacies identified during the audit concerns the fact that the data on the education of persons with foreign qualifications and degrees is partially inaccurate.⁶³ Attention should be paid to the accuracy of such data so that the national education statistics can be kept reliable. The importance of this matter was emphasised in the opinions submitted for the audit but due to time-related and content-related limitations it was impossible to deal with the matter in any greater detail in the audit itself.⁶⁴



There is not enough information on the foreign qualifications and degrees held by immigrants.

Fragmented responsibilities make it more difficult to produce comprehensive monitoring and foresight data

Production of foresight data on labour and skills needs is the responsibility of the administrative branches of the Ministry of Economic Affairs and Employment and the Ministry of Education and Culture.⁶⁵ Foresight work is also carried out on a cross-administrative basis, for example in the long-term ENKO work led by the Ministry of Economic Affairs and Employment and in the national forum for skills anticipation (OEF) led by the Ministry of Education and Culture and the Finnish National Agency for Education. Foresight work is also carried out at regional and local level in ELY Centres, regional councils and municipalities.⁶⁶ Trade unions carry out foresight activities on a sectoral basis⁶⁷ and business actors are now also more actively engaged in foresight work.⁶⁸

In the audit, foresight issues were discussed in interviews on the knowledge base of work-based immigration. According to the interviewees, ministries have been slow to react to the need to update the foresight system.⁶⁹ There have also been problems in the cooperation between ministries and other actors.⁷⁰ According to the interviewees, regional foresight work has to manage with modest resources and it is not considered important.⁷¹ Because of foresight-related inadequacies, the overall picture of the need for foreign labour in individual sectors has remained unclear.⁷² However, a sector-specific foresight project is under way in the Ministry of Economic Affairs and Employment.⁷³ The inadequacies in the national knowledge base have also been noted in the programme on the supply and adequacy of health and social services personnel launched in autumn 2021 and rectifying the inadequacies is a strategic priority in the programme led by the Ministry of Social Affairs and Health.⁷⁴

A number of assessments of the national foresight systems in the field of labour, training and skills needs have been carried out in recent years. The most recent policy decision on the development of the foresight system was taken in 2020 in the form of the Government publication *Vaikuttavaan ennakointiin* (Towards effective foresight work).⁷⁵ The policy decision sets out the concrete guidelines, division of labour and resources required to tackle the problems affecting foresight work. The Ministry of Economic Affairs and Employment and the Ministry of Education and Culture should also have prime responsibility for the future development of the foresight system covering all aspects of labour, training and skills needs and the allocation of resources. The development work would require the preparation of joint annual plans on the content of the information produced by the foresight system and time-based allocation of the data production. According to the policy decision, the development of the foresight system should be



There is room for improvement in the anticipation of skills and labour needs.

based on an agreement on the development priorities across government terms.⁷⁶ According to the audit findings, obtaining more detailed sector-specific information on the need for foreign labour is an additional reason for updating the foresight system.

No comprehensive foresight work on labour needs has been carried out in the health and social services sector in recent years

According to the audit findings, the responsibilities for anticipating labour needs in health and social services are not clearly set. In the interviews conducted during the audit planning stage, public officials of the Ministry of Social Affairs and Health expressed the view that the ministry has not been particularly active in anticipating or planning the adequacy of health and social services personnel, especially from the perspective of the supply of foreign labour.⁷⁷ The modest role played by the Ministry of Social Affairs and Health was also highlighted in the interviews with experts and representatives of government agencies. The Ministry of Social Affairs and Health has participated in the deliberations of the working groups established in other administrative branches to discuss the anticipation of labour and training needs but it was reported that the ministry withdrew from the cross-administrative ENKO work in 2015.⁷⁸

In recent years, the administrative branch of the Ministry of Economic Affairs and Employment has monitored the health and social services labour market situation and carried out work to anticipate its labour needs more actively than other administrative branches. Sectoral reports⁷⁹ have been compiled on the basis of existing statistics and foresight data to give an overall picture of the latest changes in labour needs in health and social services and of the long-term situation in the sector. At the same time, the Ministry of Education and Culture and the Finnish National Agency for Education have monitored and anticipated labour needs from the perspective of the education system as part of the work carried out in the national forum for skills anticipation.⁸⁰

From the perspective of anticipating labour needs in health and social services, the responsibilities between the parties are rather vaguely set, which has made it more difficult to obtain information on the sector. There are still blind spots in the monitoring, complicating comprehensive foresight work. Private health and social services are a major blind spot and monitoring labour needs in this sector is not a clear responsibility of the Ministry of Social Affairs and Health or the Ministry of Economic Affairs and Employment. However, monitoring of the health and social services should be carried out at the level of professional groups as the qualification requirements for different sectors are laid down in the law and



The Ministry of Social Affairs and Health has played only a minor role in the anticipation of the need for foreign labour in health and social services.



Labour needs in health and social services should be anticipated on a systematic basis by professional group so that the information could be of use for training providers.

rough estimates of personnel needs are not particularly useful for such parties as training providers. The point-like nature of the foresight and monitoring data available has also made it more difficult to collect foresight data on health and social services.⁸¹

At the end of 2021, the Ministry of Social Affairs and Health took a more active role in the work concerning labour needs in health and social services by launching a cross-administrative programme on how to ensure adequacy and availability of health and social services personnel. The programme will produce a situation picture and forecasts of national and regional labour needs and the key measures required to deal with the situation.⁸² The first results of the programme are expected to be published soon and there has been some public debate on what the working group can achieve by the deadline set.

The coordination of work-based immigration of health and social services personnel has started in a situation where companies are already recruiting employees from abroad and the persons coming to Finland are of different nationalities and have different educational backgrounds. However, many of the immigrants are unable to work in the professions to which they have been trained in the countries of origin. Obtaining the necessary qualifications often requires supplementary studies in Finland. According to the representatives of the Ministry of Social Affairs and Health, the skills, professional qualifications and further training needs of health and social services workers coming to Finland should be planned on a more clearly defined basis.⁸³ According to the audit findings, coordination is urgently needed because work-based immigration is already a reality in health and social services while many of the measures concerning the recognition of skills, further training needs and support for employers have been dimensioned for a smaller number of immigrants. There is also a need for practices supporting immigration; in fact, the Ministry of Social Affairs and Health was already tasked with planning such practices in the action plan for labour migration published in 2009.⁸⁴

The view expressed on several occasions during the audit was that the labour shortage in health and social services and the preparations required to deal with them have come as a surprise to many actors, especially to the Ministry of Social Affairs and Health. In practice, the matter should not have come as a surprise because changes in the labour needs in health and social services have been anticipated for the last 20 to 30 years and documents containing proposals on how to improve the situation have also been prepared for the ministry. However, matters have not progressed as expected and solutions are now urgently needed. For example, the training system could have been modified so that it would support, in an optimum manner, further training of health and social services workers coming from other countries.



The programme on the supply and adequacy of labour in health and social services is expected to produce concrete measures.

3 Have measures been taken to ensure an efficient and customer-oriented permit and service system for work-based immigration?

Systematic measures have been taken to improve the permit processes after the transfer of the administration of work-based immigration to the Ministry of Economic Affairs and Employment. Applications for work-based residence permits are now processed more quickly. Permit applications for specialists and start-up entrepreneurs are processed within the targeted period of two weeks. Residence permit processes for employees and entrepreneurs are still long.

According to the audit findings, there is still room for improvement in the customer-orientation of the permit and service system for work-based immigrants and in the steering and advice received by the customers. From the customers' perspective, there is also room for improvement in the service-orientation of the Finnish Immigration Service, and the permit processes in particular should be more predictable for the applicants and their employers.

More extensive outsourcing of the residence permit tasks of Finnish diplomatic missions and the introduction of remote interviews with the applicants conducted from Finland can make the system more efficient and customer-oriented. For the customers, the changes would mean smoother services and lower travel costs.

3.1 Permit processes have been systematically improved and the applications for work-based residence permits are now processed more quickly

According to the audit findings, slow and bureaucratic permit processes have been one important reason why relatively few foreign employees have been recruited. Several reports on the bottlenecks affecting the permit process were produced between 2018 and 2020⁸⁵ and the conclusions made in them are known to government agencies.



The bottlenecks of the permit process have been determined and the public administration continues the efforts to eliminate them.

Systematic measures have been taken to improve the permit processes after the transfer of the administration of work-based immigration to the Ministry of Economic Affairs and Employment. In the audit, the Ministry of Economic Affairs and Employment received thanks from other ministries and large cities for an inclusive approach to the development of permit processes in which the views of stakeholders are also heard. However, the efficiency of the permit process is still negatively impacted by the division of the process between several government agencies, additional work caused by incomplete applications and the slow processing of partial decisions on permit applications for employees and entrepreneurs. In some countries, the early stages of the permit process are slowed down by queues in Finnish diplomatic missions.

One purpose of the project to improve the legislation on foreigners and permit procedures launched in April 2020 has been to eliminate the bottlenecks affecting the permit process.⁸⁶ The latest of the development measures is the updating of chapter 5 of the Aliens Act, which is now under way.⁸⁷ In addition to legislative changes, streamlining of the permit processes also requires more automation and changes in the information system of the immigration authorities. According to the Finnish Immigration Service, there are several processes that could still be automated. However, the processes cannot be fully automated because there are provisions in the Finnish law preventing it.⁸⁸

The Ministry of the Interior will determine by the end of March 2023, which changes are required in the special legislation on immigration so that automated decision-making can be introduced.⁸⁹ The Ministry of the Interior has been preparing special legislation that would allow the Finnish Immigration Service to automate some of the matters it processes.⁹⁰

The Finnish Immigration Service has already successfully used partial automation in the processing of residence permit applications. The partially automated system checks that all permit criteria have been met and automatically prepares the proposal that the processing official can review and approve. Partial automation has allowed the Finnish Immigration Service to speed up such matters as the processing of the applications for temporary protection submitted by Ukrainians.⁹¹ In the future, automation will considerably speed up the permit process, especially if there is a substantial increase in the number of applications.



Partial automation has been successfully used in the processing of residence permit applications.

Permit applications of specialists are processed within the targeted time, whereas the applications submitted by employees are not

According to the target set in the Programme of Prime Minister Sanna Marin's Government, applications for work-based residence permits should be processed within an average of one month.⁹² A total of 11,428 first residence permits were granted on the basis of work during 2021. Residence permits for employed persons accounted for just over half of this total (5,929). Residence permit applications for employees are submitted by such persons as cooks, care assistants, cleaners and restaurant workers. In the same year, a total of 1,293 positive decisions on residence permit applications for specialists were made. Under the Aliens Act, a specialist is a person coming to Finland to work in expert duties requiring special expertise.⁹³ Specialists include such persons as IT experts. Most of the foreign specialists have moved to Finland from Russia, India and China.⁹⁴ The fast track procedure for specialists was introduced in June 2022. Fast track is a service pledge under which the Finnish Immigration Service promises to make the decision on the electronic residence permit applications submitted by specialists, start-up entrepreneurs and their family members within 14 days of the submitting of the application.⁹⁵

The application processing times were reduced during 2021 and again in early 2022. However, the processing times depend on the grounds for submitting the residence permit application. Most of the applications submitted by specialists and seasonal workers are processed quite quickly. The two-stage permit processes for employees, entrepreneurs and start-up entrepreneurs are slower. In the processing of a residence permit application for an employed person, the TE Office first makes a partial decision. For this decision, the TE Office examines whether employees for the task in question are available within a reasonable time in Finland, in the EU or the EEA. The TE Office also determines whether the terms of employment are in accordance with the law, whether the employer has managed all its obligations and whether the applicant has sufficient financial resources for living in Finland. In autumn 2022, the TE Offices introduced a joint processing queue in the processing of residence permit applications for employed persons.⁹⁶ In the processing of residence permit applications for entrepreneurs, the ELY Centre first determines whether the business operations are profitable and whether the entrepreneur has sufficient financial resources for living in Finland. Start-up entrepreneurs must obtain a positive eligibility statement from Business Finland before applying for a residence permit.⁹⁷ The Finnish Immigration Service makes its decision after these partial decisions and eligibility statements.



More than half of all work-based residence permits are granted to employees.

In 2021, the aim was to process the residence permit applications for employed persons that included the partial decision of the TE Office within 45 days. The target was not met: the actual processing time was 75 days. The target set for 2022 was 30 days.⁹⁸ In July 2022, residence permit applications for employed persons were processed in an average of 68 days. In 2021, processing times of residence permit applications for specialists were close to the targeted two weeks. In July 2022, they were processed in an average of eight days. (See Table 1.)

Table 1: Average processing times of applications for work-based residence permits (in days) in the period 2018-2021 and in July 2022.⁹⁹

Permit type	2018	2019	2020	2021	July 2022
Permits for employed persons requiring partial decisions	160	157	143	75	68
Permits for specialists	24	45	22	15	8
Residence permits for entrepreneurs	258	259	259	186	85
Residence permits for start-up entrepreneurs	62	49	70	24	15

As shown by the processing times, the risk-based processing model introduced in May 2022 is already having an impact. In this model, a maximum of 20 per cent of all applications are channelled to more detailed examination through automated checks. According to the Finnish Immigration Service, the model requires considerably less personnel resources.¹⁰⁰

With the updating of chapter 5 of the Aliens Act, the information obtained from the registers of other government agencies could be used more efficiently in residence permit matters.¹⁰¹ According to the employers interviewed for the audit, this would be a major improvement on the existing situation.

The partial decision stage will be transferred from TE Offices to the Finnish Immigration Service when employment services become a local government responsibility in 2025, and this may also speed up the permit process. The partial decision stage in TE Offices is the slowest part of the processing of residence permit applications for employed persons. In the Finnish Immigration Service, half of all residence permit applications for employed persons are processed within eight days of their arrival from the TE Office.¹⁰²

Under the Government proposal for the reorganisation of public employment and business services, labour market testing would also be transferred to the Finnish Immigration Service in 2025. Making a single government agency responsible for the decision-making and



In July 2022, residence permit applications for specialists were processed in an average of eight days.



Risk-based processing, automation and transfer of partial decisions from TE Offices to the Finnish Immigration Service will make the permit process more efficient.

ending the issuing of partial decisions are justified when considering the Government's aim of streamlining entry into the country and speeding up the decision-making process.¹⁰³ According to the audit findings, there is a risk that if the changes are implemented, less consideration will be given to regional aspects in the permit process. According to the Ministry of the Interior, simplifying the permit process and making it more efficient would also require the abolition of labour market testing or at least the examination of this option.¹⁰⁴

According to the audit findings, the efficiency of the permit process has been adversely impacted by the fact that labour market testing takes place on a regional basis far away from the location where the employee in question works. For example, from the perspective of the City of Turku, the problem is that the labour market testing takes place in the Pirkanmaa TE Office and not in the Southwest Finland TE Office. This factor has also slowed down the processes. Moreover, the Pirkanmaa TE Office does not have the same incentives as the Southwest Finland TE Office to ensure that somebody in Southwest Finland can find work without delay.¹⁰⁵

The ELY Centre for North Savo also highlighted the fact the partial decisions concerning the region are made in places that are too far away from North Savo. They are taken in the Southeast Finland TE Office, which is responsible for the partial decisions for North Savo and five other regions. In practice, the region under the auspices of the Southeast Finland TE Office is too large and the efficiency of the process has been adversely affected.¹⁰⁶ Under a Ministry of Economic Affairs and Employment decree, the TE Offices for Uusimaa, Southeast Finland, Pirkanmaa and North Ostrobothnia are the government authorities with competence to perform the tasks that are the responsibility of Employment and Economic Development Offices under the Aliens Act (301/2004).¹⁰⁷

Residence permit applications for start-up entrepreneurs are now processed more quickly than in the past but entrepreneurs still have to wait quite a while for a decision on their permit applications

In 2021, a total of 155 residence permits for start-up entrepreneurs were granted, which was significantly more than in the preceding years when about 50 such permits were granted annually.¹⁰⁸ In 2021, the residence permit applications for start-up entrepreneurs were processed in 24 days, which was considerably less than in the preceding years. In July 2022, the average processing time was 15 days. (See Table 1). In the audit, Business Finland was commended by experts for issuing the eligibility statements required for the residence permit applications without delay.

In 2021, the average processing time of residence permit applications for entrepreneurs was 186 days. Processing in ELY Centres accounted for most of this time; in them, the processing took an average of 121 days. Following this stage, it took an average of 52 days for the Finnish Immigration Service to make its own decision.¹⁰⁹ The time required for processing residence permit applications for entrepreneurs was considerably shortened in 2022, to an average of 85 days (see Table 1).

Under the Government proposal for amending the Aliens Act, the residence permit applications for entrepreneurs should be processed within two months, which is also the maximum period set for all other work-based residence permit applications. This time would be evenly split between ELY Centres and the Finnish Immigration Service.¹¹⁰ This would be a major change to the current situation, especially because there is more room for discretion in entrepreneurs' residence permits than in the residence permits granted on the basis of work. There are also aspects in the residence permit for an entrepreneur that cannot be easily automated, such as the assessment of the business plan.¹¹¹ Most of the applicants receive a negative decision because they do not have any prerequisites for profitable business operations. In 2021, some 72 per cent of all residence permit applications for entrepreneurs were rejected.¹¹² The figure for all work-based residence permit applications is less than 20 per cent.¹¹³

In the interviews with experts and in the survey among entrepreneurs conducted for the audit, the entrepreneurs' residence permit process was characterised as lengthy and excessively complicated. The view was that even many Finnish entrepreneurs would fail in the permit process and thus it is no surprise that so many entrepreneurs coming from outside the EU and the EEA have their applications rejected. The interviewees also noted that under the permit system, persons that might have great entrepreneurship potential but do not have any business experience cannot enter Finland.¹¹⁴

The Ministry of Economic Affairs and Employment is working to speed up the permit process for entrepreneurs.¹¹⁵ According to the Finnish Immigration Service, the permit process for entrepreneurs could be speeded up by retrieving the required data directly from official registers and by converting the application form into a smart form. Since 2022, automation has been used more extensively in the processing of residence permit applications for entrepreneurs and a risk-based processing model will also be introduced. In this model, a maximum of 20 per cent of all applications will be examined in more detail.¹¹⁶



Work-based immigration can only be promoted if the residence permit process for entrepreneurs is substantially speeded up.

D visa did not lead to the expected increase in work-based immigration

A national visa (D visa) was introduced on 1 June 2022 to facilitate the fulfilment of the service pledge for specialists' fast track. The visa, which is intended for long-term stay, is valid for 100 days.¹¹⁷

It was hoped that the D visa would facilitate the meeting of the 14-day fast track service pledge so that specialists, start-up entrepreneurs and their family members can travel to Finland as soon as the residence permit has been granted.¹¹⁸ The visa does not impact the processing times of residence permit applications. The official estimate was that the permit process would be shortened by between 7 and 14 days. The time savings can only be achieved if the application for the long-term visa is submitted together with the residence permit application in the e-service. In the implementation of the legislative amendment, applicants are advised to submit the applications together. The provision of information and training are the responsibility of the Finnish Immigration Service.¹¹⁹

The official estimate during the preparatory stage was that about 80 per cent of all specialists, start-up entrepreneurs and their family members might apply for the visa. According to a rough estimate, about 2,500 applications for long-term visas would be submitted each year.¹²⁰

According to the audit findings, it is quite possible that the D visa will have little practical significance. According to the survey conducted by the National Audit Office among Finnish diplomatic missions, only a small percentage of all international specialists applied for a D visa during the early stages of its introduction. Most of the missions (8/12) were of the view that in the future, a maximum of 10 per cent of all specialists would apply for a D visa. The Finnish diplomatic missions in Iran and Türkiye estimated that the targeted share of between 70 and 90 per cent would be achieved. According to the information provided by the Finnish Immigration Service, a total of 347 applications for D visas were submitted between June and September 2022.¹²¹

In March and April 2022, the Ministry for Foreign Affairs arranged several training events on D visa for Finnish diplomatic missions. An information package on the reform was also sent to the missions.¹²² However, according to the survey conducted by the National Audit Office, the missions felt that the information supplied by the ministry was inadequate.

Use of the D visa is in the process of being expanded. Under the Government proposal submitted in June 2022, provisions will be added to the Aliens Act on granting the national visa to students, researchers, employees of certified employers, persons in managerial positions in enterprises and the family members of the above groups.¹²³



Only a fraction of the specialists applied for a D visa during the first two to three months.

According to the audit findings, the cost benefits of the D visa or, more extensively, those of the fast track, should be assessed. It was estimated in the Government proposal, that the information system changes necessitated by the fast track would generate one-off costs of EUR 3,964,250. The costs would be shared between Finland's foreign affairs administration (EUR 3,030,250) and the Finnish Immigration Service (EUR 934,000).¹²⁴ By the end of May 2022, the estimated cost share of Finnish Immigration Service had risen to EUR 1,050,000.¹²⁵

According to the Ministry of Economic Affairs and Employment, when the cost estimate is examined it should be remembered that the system changes developed for the fast track can in the future also be used more extensively in the processing of other permits.¹²⁶

In work-based immigration, there should be more focus on operational work and service sectors

According to the company representatives and experts interviewed for the audit, in work-based immigration, there should be more focus on operational work and service sectors, and specialists should not be the only key group.

According to the established administrative practice and case law, the monthly gross pay of a specialist should be at least EUR 3,000.¹²⁷ According to the Government proposal for amending the Aliens Act, a foreign national can be granted a residence permit for a specialist if they work in expert tasks requiring special expertise and the salary paid for the work is at least the average gross salary paid to a wage earner. In the Government proposal, the minimum salary of a specialist is set at EUR 3,380 and the limit would be adjusted each year.¹²⁸

If the Government proposal is approved unchanged it may slow down permit processing because a larger proportion of the applicants would be left outside the fast track procedure intended for specialists. In many of the comments on the Government proposal, attention was also drawn to the revised criteria for special expertise. It was pointed out in the comments that there would be more administrative work if the specialist's minimum pay requirement is increased from the widely accepted total of EUR 3,000.

As a result of the proposed amendment, more applications would have to be reviewed by TE Offices as part of the partial decision procedure. However, it was stated in the Government proposal that the changes to the wage limit would have positive impacts on employees because employers would raise wages above the limit required of specialists.¹²⁹



The information system changes required by the fast track procedure have cost a total of four million euros.

In practice, there is a high degree of inequality between specialists and employees. Family members of specialists usually receive a residence permit quickly and at the same time as the sponsor, while for employees, family reunification is a slow and expensive process (for more details, see Section 4). Slowness of the family reunification procedure and uncertainties concerning the process also mean that it is difficult to attract employees to Finland with campaigns as they cannot be promised that their family members can move to Finland.¹³⁰

3.2 From the customers' perspective, the permit process has become slightly less bureaucratic but it is too slow for companies planning to recruit foreigners

In this audit, the specialists applying for a work-based residence permit in Finland and the companies employing them were jointly considered as customers. Customer-orientation of the permit process was examined with surveys conducted among companies, diplomatic missions and project actors.

Based on statistics and from the perspective of the authorities, the permit process has become less bureaucratic in recent years. Customers are much less satisfied with the situation. Only six per cent of the respondents to the survey conducted among companies were of the view that the permit process has been speeded up over the past 12 months. Some 56 per cent of the respondents considered the permit process for work-based immigration is too slow for their companies' labour needs. (See Figure 3.) Incomplete applications and applications submitted on false grounds and returned to applicants, the slow and bureaucratic processes of the Finnish Immigration Service and the fact that it is difficult for employers to get a clear picture of the complex process were given as reasons for the problems.



It is difficult for employers to get a clear picture of the complex permit process.

Companies: Considering the labour needs of our company, the permit process for work-based immigration is

Number of respondents (n=34)

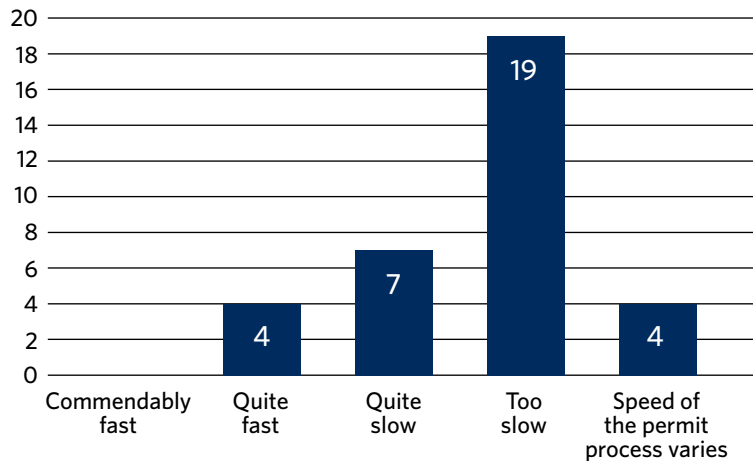


Figure 3: Companies' responses to the question "In my opinion, considering the labour needs of our company, the permit process for work-based immigration is...". Source: Company survey conducted by the NAOF 29 March 2022.

From the customers' perspective, the fact that the duration of the permit process cannot be anticipated and that it is difficult for employers to obtain information on the process progress from the authorities make the permit process even more complicated. Only three per cent of the respondents to the survey conducted among companies were of the view that the progress of the permit process can be easily anticipated. Some 29 per cent of the respondents told that they had received some information on the process progress from the authorities during the process. Some 27 per cent of the respondents had not received any information on this matter. The unpredictability of the permit process is a major problem from the companies' perspective. A company is expected to make a firm commitment to hire an employee when the application process starts even though it does not know whether the employee will start work one week or six months later. The services provided by different government agencies are not of uniform quality, which makes the permit process even more unpredictable.



Three per cent of the respondents to the company survey were of the view that the progress of the permit process can be easily anticipated.

Queues in Finnish diplomatic missions have become shorter

Both the authorities and the customers agree that the slow initial stage of the processing of work-based residence permit applications in the countries of origin outside the EU and the EEA is one of the bottlenecks in the permit process. Finland's foreign affairs administration was allocated additional resources for work-based

immigration at the start of 2022 in accordance with the Programme of Prime Minister Sanna Marin's Government. Labour consuls and coordinators have been posted to Finnish diplomatic missions to manage labour matters and to speed up permit processes.¹³¹

Labour consuls have been posted to Finnish diplomatic missions in New Delhi in India (two) and in Manila in the Philippines (one) for a term of two years. Three roving labour consuls and one coordinator have also been appointed for a two-year period. They are based in Helsinki and one of their tasks is to reduce the application backlog.¹³²

According to the survey conducted among Finnish diplomatic missions for the audit, a labour consul had worked in three of the 15 missions submitting responses (India, Kosovo and the Philippines). These three missions had been able to increase the number of pending applications and the labour consul had helped to reduce the application backlog. For example, in the Finnish embassy in Manila, which used to have a substantial application backlog, the aim is that from autumn 2022, applicants can get an appointment for identification within one week of submitting their application. In most of Finland's diplomatic missions, the appointment is granted within about one month.

According to the survey results, there are considerable differences in the length of the queues between diplomatic missions. In July and August 2022, some of the missions did not have any queues, while in other missions up to 135 applicants were waiting for an appointment. The queues are, however, shorter than during the coronavirus pandemic. For example, in October 2021, the Finnish embassy in New Delhi had a backlog of 2,060 applicants and 850 of them were Afghans and the rest were students, work-based applicants and persons applying for family reunification. According to the Ministry for Foreign Affairs and Business Finland, India is one of the countries from where Finland would like to recruit specialists and which is targeted with recruitment campaigns.¹³³

The permit process can be made more efficient and customer-oriented with external service providers, remote interviews of applicants and employer certification

Legislative amendments under preparation and those already in force are also intended to speed up the initial stages of the permit process. They will enable Finnish government agencies to use external service providers more extensively, conduct remote interviews with applicants in foreign countries and certify trusted employers.



Labour consuls have helped to shorten the queues.

The amendment to the Aliens Act (121/2022, section 28a), which entered into force in June 2022, contains provisions on the tasks of external service providers in the application process for long-term visas (D visa). Under the amendment, information, applications and visa fees can be delivered to external service providers and the service providers may forward these documents to Finnish diplomatic missions. By the end of 2021, the Ministry for Foreign Affairs had agreed to outsource residence permit tasks to an external service provider (VFS Global) in India, the Philippines, Nigeria, Ethiopia, Kenya, Türkiye, Ukraine and Russia (in St Petersburg). Electronic applications have been outsourced in the United States and Canada.¹³⁴ The Ministry for Foreign Affairs and the Finnish diplomatic missions are responsible for guiding and supervising the external service provider.

The experts interviewed for the audit were of the view that using external service providers in the permit process is desirable and that it will speed up the process. Outsourcing of the tasks will streamline the services intended for the applicants and employers and will help applicants to save travel costs. In the optimum situation, the use of external service providers may significantly facilitate the essential contacts between the applicants and the Finnish authorities. According to the survey conducted among Finnish diplomatic missions, the outsourcing has streamlined the permit process because the applicants are now able to identify themselves more quickly and they do not need to travel to the missions over long distances. However, not all Finnish diplomatic missions are satisfied with the work of the external service provider. In their view, VFS Global makes errors and public officials need to spend a great deal of time correcting them.

Oral interviews have slowed down permit processes in the diplomatic missions. According to the Ministry for Foreign Affairs, many of the persons applying for family reunification and those applying for low-pay jobs are interviewed. However, a diplomatic mission may only have between one and three interview booths and the process may also be slowed down by difficulty in getting interpreters.

Under the amendment to chapter 5 of the Aliens Act, which is now under preparation, the Finnish Immigration Service could conduct the interviews on a remote basis. If necessary, public officials of the Finnish Immigration Service could also conduct the interviews in the facilities of the external service provider if the facilities, arrangements and their safety can be ensured.¹³⁵ According to the Ministry for Foreign Affairs, remote interviews are common in many European countries.¹³⁶



Outsourcing the visa tasks will streamline the services intended for the applicants and employers and will help applicants to save travel costs.



Not all diplomatic missions are satisfied with the work of VFS Global.

Ten of the 15 missions participating in the survey conducted for the audit were of the view that remote interviews would significantly or quite significantly speed up work-based residence permit processes. The diplomatic missions were of the opinion that the Finnish Immigration Service would have more personnel resources to conduct the interviews. Transferring the interviews to the Finnish Immigration Service would allow diplomatic missions to use more resources for processing applications and identifying applicants. The Finnish diplomatic mission in St Petersburg has piloted remote interviews in cooperation with the Finnish Immigration Service. In this particular diplomatic mission, the permit process has been shortened by as much as six months.

Conducting the interviews on a remote basis would also significantly benefit the customers (applicants and their employers). According to the diplomatic missions and the Finnish Immigration Service,¹³⁷ applicants would save travel costs if the interviews were conducted in the facilities of the external service provider. In remote interviews, the applicants can be asked questions that are particularly relevant to the decision-making, which would reduce the need for written questions to clarify matters. This would speed up the process. The interviewer's lack of local knowledge and the fact that interaction is different in a remote interview may cause problems for the customer in the remote interview process.¹³⁸ From the diplomatic missions' perspective, practical problems may arise as a result of poor online connections and the shortage of interpreters.

Remote interviews also involve several technical aspects that are still unclear and that must be solved before any interviews are conducted.¹³⁹ They concern such issues as the requirements for a secure telephone connection, signing of the interview record, recording of the oral interview and keeping and destruction of the recorded interview.

A number of responsibility matters between the Finnish Immigration Service and the Ministry for Foreign Affairs must also be solved before the remote interviews can be transferred to the Finnish Immigration Service. For example, it has not yet been decided which of the parties would supply the equipment to the diplomatic missions, manage the interview facilities and ensure that the facilities are suited for conducting the interviews. The parties must also decide which of them would manage the interview timetables and contacts with the customers as well as organise the interpreting. The sharing of expenses and revenue must also be determined if the interviews are conducted by the Finnish Immigration Service.¹⁴⁰ The technical issues can be solved but this would require joint intent and smooth cooperation between the Finnish Immigration Service and the Ministry for Foreign Affairs. According to the Ministry for Foreign Affairs, cooperation with the Finnish Immigration Service will be expanded.¹⁴¹



Remote interviews with the applicants may speed up the permit processes by as much as six months. It requires close cooperation between the Finnish Immigration Service and the Ministry for Foreign Affairs.



Many of the technical aspects of the remote interviews and issues concerning the division of responsibilities between the Finnish Immigration Service and the Ministry for Foreign Affairs in the process remain open.

Certification of trusted employers may also help to make the permit system more efficient and customer oriented. Provisions on this are contained in the proposed amendments to the Aliens Act.¹⁴² According to the proposed amendments, certified employers would not have to provide the permit authorities with the information checked in connection with the certification application again as part of the residence permit application for their employees. According to the audit findings, this would significantly boost customer satisfaction among employers recruiting workers from outside the EU and the EEA on a regular basis. Certification based on clear and transparent criteria was positively viewed by the health and social services companies interviewed for the audit.¹⁴³ However, the impact of the certification would depend on how many employers are covered. According to the Government proposal, provisions on the prerequisites for the certification would be laid down by Government decree.¹⁴⁴



Certification of employers may make the permit process more efficient and customer oriented if it is introduced extensively enough.

3.3 There is still room for improvement in the guidance and advisory services for immigrants arriving in Finland on the basis of work

Since 2020, the Ministry of Economic Affairs and Employment has provided municipalities and joint municipal authorities with special grants for launching and developing immigration guidance and advisory services. The focus in the autumn 2022 special grant round, in which 21 local government projects received support, was on the development and consolidation of guidance and advisory services.¹⁴⁵ According to the audit findings, the guidance and advisory services are still under development.



The fragmented field of actors in work-based immigration is reflected in the guidance and advice received by customers.

In the survey conducted among Finnish diplomatic missions, some 44 per cent of the respondents were of the view that residence permit applicants do not receive enough guidance and advice during the permit process. Some 67 per cent of the respondents in the survey conducted among project actors felt that work-based immigrants and their family members are not offered enough general guidance and advisory services during the permit process.

According to the experts interviewed for the audit, there are gaps in pre-entry advisory services. Finnish diplomatic missions feel that the provision of advice is hampered by inadequate language proficiency among the applicants and the lack of non-English instructions. Insufficient digital skills among the applicants and the fact that the mission staff members do not always have time to guide the applicants in the completion of the applications also cause problems. Furthermore, in some countries, applicants use agents to assist them in the application process and these assistants do not always provide the applicants with the right advice.

According to the survey conducted among companies, companies facing problems consult the internet and contact the authorities, primarily the Finnish Immigration Service and TE Offices. Project representatives also contact officials in cities and other municipalities. The time it took for the authorities to respond to the contacts varied greatly (see Figure 4). As a rule, project representatives received responses more quickly than companies. Companies and project actors ranked the Ministry of Economic Affairs and Employment and TE Offices as the top cooperation partners, while the Finnish Immigration Service got the lowest marks in this respect. The internet pages of the Finnish Immigration Service and TE Offices were the websites most frequently consulted by the survey respondents. The respondents ranked the overall website quality as fair even though in their view, there have been improvements. In autumn 2022, a one-stop-shop advisory service for employers was opened as part of the Work in Finland activities.¹⁴⁶

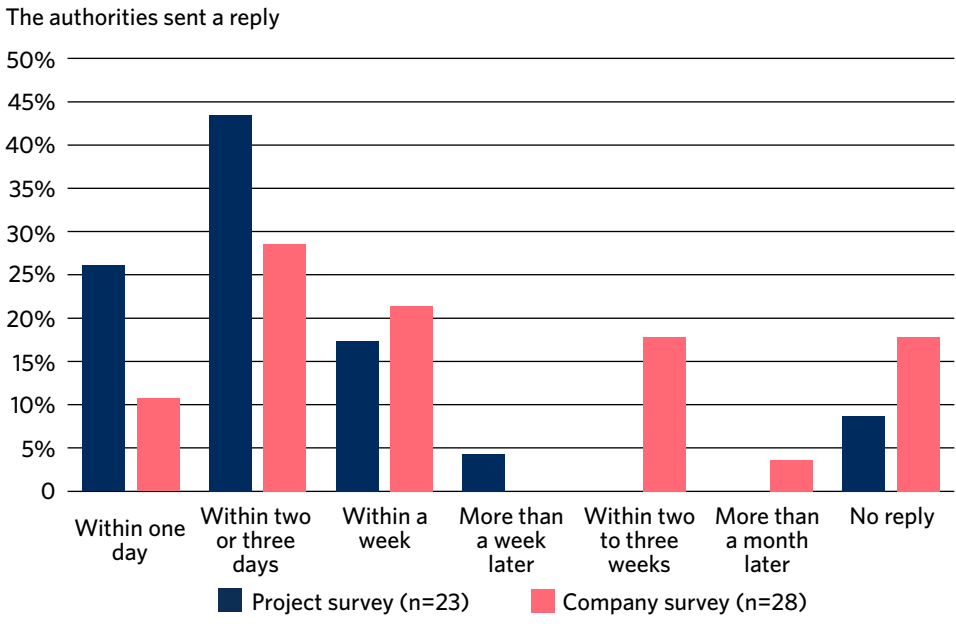


Figure 4: Average response time of the authorities to contacts by companies and project actors. Source: Surveys conducted for the audit.

The projects have led to the creation of a wide range of new advisory services for immigrants providing customers with information on existing and well-established services. However, the capacity of these new services is inadequate and they do not eliminate the problems arising from a fragmented field of actors.

In large cities, local government officials serve employers in permit matters as well as they can. However, the officials working in the city advisory services do not have any direct line of communication with the permit authorities and they have to queue for the same telephone services as the employers.

Project actors that took part in the survey conducted for the audit also felt that central government agencies should invest more in their own advisory services and not expect municipalities and organisations to provide immigrants with advice in matters falling within the purview of central government agencies. The Finnish Immigration Service and the Digital and Population Data Services Agency, which is responsible for registering foreigners, received the lowest marks for customer orientation in the surveys among companies and project actors.

In the Digital and Population Data Services Agency, work is under way to improve service availability and customer orientation. In 2022, the aim was to shorten service processing times for individual customers.¹⁴⁷ The Digital and Population Data Services Agency and the Ministry of Finance, which steers the agency, are jointly working to make the services more customer oriented by means of systematic digitalisation and by improving customer communications and guidance. Under the performance agreement between the Ministry of Finance and the Digital and Population Data Services Agency for 2022, the registration of work-based immigration customers should be speeded up.¹⁴⁸

Service orientation of Finnish Immigration Service is seen as inadequate

According to the Talent Boost follow-up report, the Finnish Immigration Service should provide companies with better advisory services in residence permit matters and integrate the services more closely into regional service networks.¹⁴⁹ At the same time, under the performance targets set for the Finnish Immigration Service by the Ministry of the Interior, residence permit processes should be customer-oriented and of high quality and the customer service in the agency should be quick and transparent.¹⁵⁰

Streamlining the permit process of work-based applicants and enhancing customer orientation have been priority areas in the Finnish Immigration Service since 2021. Customer orientation has been improved by, for example, introducing automated messages to customers. In the messages, customers are provided with information on the progress of their applications and the process in general. A new feature was added to the Finnish Immigration Service's Kamu chatbot in 2021, allowing customers to track the progress of their applications.¹⁵¹ Even though this has made the function more



The view is that the Finnish Immigration Service and the Digital and Population Data Services Agency are shifting their responsibilities as service agencies to other parties.

popular, employers and residence permit applicants need to know more than how far their applicants have progressed. It would be particularly important for companies recruiting large numbers of foreign employees to have a contact person in the Finnish Immigration Service to whom inquiries could be sent to and to whom the companies could also provide additional details on applicants whose permit processes are lasting long for some reasons.¹⁵²

At the end of February 2022, the Finnish Immigration Service launched a new telephone service for its customers. According to the Finnish Immigration Service, the advisory service has been well received and the feedback from customers and stakeholders has been positive.¹⁵³ At the time when the audit survey among companies was being carried out, the new telephone service had been operational for one month. Some 12 per cent of the respondents said that they were aware of the new service, while 88 per cent said that they were not.

According to the audit findings, the operating culture of the Finnish Immigration Service does not yet fully support the achievement of the objectives set for work-based immigration. In the opinion of its customers, the original statutory task of the Finnish Immigration Service is still reflected in its operations. The original purpose of the agency was to process all applications appropriately and thoroughly in advance and to combat the risks arising from immigration and not to provide good customer service or to attract immigrants to Finland.

According to the Ministry of the Interior and the Ministry of Economic Affairs and Employment, the two ministries steering the Finnish Immigration Service, the agency must change its operating practices and culture.¹⁵⁴ The view of the Finnish Immigration Service is that the transformation from an internal security actor towards a customer service organisation is under way but it requires new thinking from the personnel. The aim is that the processes are planned from the perspective of the masses and risk profiling is used to ensure that all cases of abuse are uncovered.¹⁵⁵ According to the information received from the Finnish Immigration Service in May 2022, the operating procedures in the agency have been developed in this direction.¹⁵⁶

The development work under way in the agency is not yet fully reflected in customer satisfaction. Customers consider the Finnish Immigration Service as distant and feel that the agency operates too far away from the everyday customer interface. In the survey conducted by the Finland Chamber of Commerce in early 2022, some 25 per cent of the companies taking part were dissatisfied or highly dissatisfied with the work of the Finnish Immigration Service. This percentage is significantly higher than the proportion of companies dissatisfied with the immigration services provided by the Finnish Tax Administration or municipalities.¹⁵⁷

4 Have the objectives concerning a more customer-oriented permit and service system for health and social services employees been achieved?

According to the audit findings, permit processes for health and social services employees have been speeded up in recent years. This has been the result of the additional resources granted to the Finnish Immigration Service and better awareness among employers of the information required by TE Offices for partial decisions on residence permits for employed persons. In Uusimaa, the process has been speeded up by the temporary abolition of labour market testing for several health and social services professions. However, family reunification is still slow and expensive for health and social services employees.

Work-based immigration does not offer any quick partial solutions to the labour shortage in health and social services. For persons that have received their training outside Finland, the process of obtaining professional practice rights may take several years. Work-based residence permits for a profession requiring licensing cannot be directly granted to persons that have received their health and social services training outside the EU and the EEA. Nurses that have received their health and social services training outside Finland can only obtain the necessary qualifications by working in specific projects. However, all persons trained as doctors outside the EU and the EEA must take the same qualification path. Presenting the language certificate to Valvira is a prerequisite for receiving the professional practice rights but checking the language proficiency needed in the work is the employer's responsibility.

4.1 Permit processes for health and social services employees have been speeded up but family reunification is still an expensive and slow process

The permit process for nursing professionals seeking to work in health and social services has two stages and it includes a partial decision by a TE Office (see Section 3). According to health and social services companies recruiting nursing professionals from outside the EU and the EEA, partial decisions are now made more quickly than in the past. There is substantial variation between regions in the additional information requested from the employers and the employers do not always consider the differences reasonable. According to health and social services recruitment companies, the permit processes have been speeded up by the additional resources allocated to the Finnish Immigration Service and the fact that employers are more aware of the information required by TE Offices for partial decisions. Furthermore, labour market testing of specific health and social services workers was temporarily abolished in Uusimaa in Autumn 2021 and according to health and social services recruitment companies, this has already led to speedier permit processes.

According to health and social services recruitment companies, the permit process for nursing professionals lasts between five to six weeks and three months. At its longest, the permit process has taken nine months. In the Philippines in particular, the process has been considerably speeded up as a result of additional resources and the reopening of the Finnish embassy in the country. The companies handling permit matters have not experienced any problems with the processing of permit matters in Singapore and Hong Kong. At the same time, however, not all companies are satisfied with the work of VFS Global, an external service provider operating in many countries.¹⁵⁸ Health and social services recruitment companies and the Helsinki Region Chamber of Commerce have urged the authorities to ensure that the residence permit applications for groups would also proceed in a speedy manner.¹⁵⁹ According to health and social services recruitment companies, the permit process has been designed for the recruitment of individual employees and not for situations where residence permit applications for large groups of employees are submitted.¹⁶⁰

Easing reunification of employees' families would be a major pull factor for Finland

Family reunification means that the family members of a person staying in Finland on a legal basis can apply for a residence permit in Finland on the basis of family ties. In 2021, the Finnish Immigration Service made a total of 8,257 positive decisions on family reunification for work-based immigrants, which was considerably more than in the preceding years.¹⁶¹ A residence permit can only be granted on the basis of family ties if the applicant has sufficient financial resources for living in Finland. If, for example, there are two adults and two underage children in the family, the applicant must have a monthly net income of EUR 2,600.¹⁶²

The income limit is not absolute. In practice, the Finnish Immigration Service applies a margin of discretion of between 10 and 15 per cent in its decisions. The Finnish Immigration Service is in the process of updating the guidelines on the income requirement. However, the existing legislation sets limits to the content of the guidelines. The VN TEAS research project may be launched in spring 2023 to prepare for any legislative amendments.¹⁶³

Few health and social services employees meet the existing salary requirements. The basic monthly pay of a care assistant is about EUR 1,900 and that of a practical nurse EUR 2,200.¹⁶⁴ The income requirements used in family reunification are an insurmountable obstacle to many foreigners working in other common Finnish professions¹⁶⁵.

In the first half of 2022 (until 31 May), processing of the residence permit application of a specialist's family member took an average of 13 days. At the same time, the processing of the residence permit application of a family member of a person granted a work-based residence permit on other grounds took 114 days (see Table 2).¹⁶⁶ In the surveys conducted for the audit among project actors and company representatives, the family reunification process was considered unreasonably long.

Table 2: Average processing times of residence permit applications submitted on the basis of family ties (in days) in the period 2018–2022 (until 31 May 2022). Source: Finnish Immigration Service.¹⁶⁷

Residence permit applications	2018	2019	2020	2021	2022
Application for the first residence permit					
Employment	102	134	109	69	69
Family members of a specialist (including specialists granted the Blue Card)	29	49	34	21	13
Family members of a start-up entrepreneur	48	53	80	48	27
Other family members of work-based residence permit holders	149	189	144	99	114
Application for an extended permit					
Employment	64	87	75	67	72
Family members of a specialist (including specialists granted the Blue Card)	23	42	32	35	22
Family members of a start-up entrepreneur	-	-	72	32	42
Other family members of work-based residence permit holders	89	112	99	85	94



Family reunification is difficult for health and social services employees.

According to the Finnish Immigration Service and Finland's diplomatic missions, the need for information and authenticated documents and the oral interviews with the applicants in the diplomatic missions are the main reasons slowing down the application process for employees' family members. The diplomatic missions urged the Finnish Immigration Service to clearly remind the applicants that the documents containing the details of the family members must be authenticated. Determining the required financial resources may also be difficult if the person applying for the family reunification has several sources of income and no permanent income. It is hoped that the Incomes Register will ease the process of determining the applicants' financial resources. In June 2022, there were also major delays in the processing of residence permit applications based on family ties because of staff shortages in the Finnish Immigration Service.¹⁶⁸

The aim of the Finnish Immigration Service is to speed up the processing of residence permit applications based on family ties. A risk-based model has been introduced in the processing of permit applications submitted for the purpose of family reunification.¹⁶⁹ Automation is also making progress but according to the Finnish Immigration Service, in matters concerning family ties, automation cannot be used as extensively as in residence permit processes based on studies and work.¹⁷⁰

According to the audit findings, by substantially easing and speeding up the family reunification process, Finland could attract more low-pay health and social services employees and encourage them to stay in this country. There is some evidence in the health and social services sector that nursing professionals have moved to Sweden where family reunification is easier.¹⁷¹ However, according to the representatives of the health and social services recruitment companies interviewed for the audit, most of the nursing professionals coming to Finland from outside the EU and the EEA stay in Finland¹⁷².

4.2 The process of granting the professional practice rights is often inflexible and difficult for the customer

Work-based immigration will only satisfy a fraction of our labour needs

In late summer 2021, the Ministry of Economic Affairs and Employment asked labour market partners, training providers, researchers and experts to give a rough estimate of the need for foreign health and social services employees in Finland in a situation where the total need for labour would be 200,000 employees by the year 2030. According to the respondents, Finland should recruit about ten per cent of its labour force from abroad by the year 2030.¹⁷³



The application process for employees' family members is slowed down by the need for information and authenticated documents as well as oral interviews.

The estimates of the annual need for foreign labour are significantly higher than the number of foreign-trained persons that are granted the right to work in health and social services professions in Finland each year. Even though thousands of work-based immigrants are needed in Finland's health and social services, Valvira granted professional practice rights to only about 500 persons in 2021 (Table 3).

The professional practice rights granted on the basis of training received outside Finland increased by 76 (18%) between 2018 and 2021. Some 71 per cent of this growth can be attributed to an increase in the number of persons that have received their doctoral training outside Finland. (Table 3) However, the number of professional practice rights is not the same as the number of persons granted such rights because one person may possess several professional practice rights.¹⁷⁴ The figures in the Table also include the Finnish nationals that have received their training in foreign countries.



Thousands of work-based immigrants would be needed in Finland's health and social services each year but only about 500 persons are granted professional practice rights each year.

Table 3: Health and social services professionals trained outside Finland that were licensed and granted the right to use protected occupational titles in the period 2018–2021. Source: Valvira's financial statements and management reports for 2020¹⁷⁵ and 2021.¹⁷⁶

Number of persons trained outside Finland that were licensed and granted the right to use protected occupational titles	2018	2019	2020	2021
Granted professional practice rights in health and social services, total	422 ¹	442	490	498
licensings	385	407	468	486
rights to use protected occupational titles	37 ¹	35	22	12
Professional practice rights granted to persons that had obtained their health care qualifications outside Finland, of whom	397	424	467	455
doctors, specialist doctors	253	283	265	307
nurses	33	50	60	48
practical nurses	17	11	8	3
Professional qualifications obtained by persons trained as social services professionals outside Finland, total	25 ²	18	23	43
licensings	25	17	22	39
rights to use protected occupational titles	*	1	1	4

¹ Does not include the rights to use protected social services occupational titles.

² Only licensed persons.

* No differentiation between qualifications obtained in Finland and in other countries can be made for the year 2018 because all practical social services nurses were entered in the register of social services professionals as a mass run. The country where the qualifications were obtained is not given for all persons.

Extensive recruitment of foreign labour is carried out through private health and social services recruitment companies

At the moment, there are no laws in Finland regulating international recruitment in health and social services as the recruitment markets operate according to the rules set by the recruitment companies. Some of the companies bring qualified nurses from the Philippines to work as care assistants and practical nurses in Finland.¹⁷⁷ Other companies recruit persons that have worked in the care sector for many years but do not necessarily possess any nursing qualifications¹⁷⁸. These persons complete the theoretical part of the care assistant's studies in the countries of origin and demonstrate their competence in Finland to parties authorised to provide the training before they start to work as care assistants.¹⁷⁹ Labour force is recruited as care assistants and practical nurses because this is the only way to bring employees to Finland from outside the EU and the EEA to work in the health and social services without any special requirements. Care assistant is not a professional qualification,¹⁸⁰ which means that a care assistant is not required to possess the professional practice rights granted by Valvira.

The recruitment models used by the Finnish health and social services recruitment companies whose representatives were interviewed for the audit resemble the Triple Win model based on the agreement between the Governments of Germany and the Philippines. The main purpose of the models is to promote work-based immigration because the foreign recruits already have a job when they arrive in Finland or in Germany.¹⁸¹ The Triple Win model used in Germany would seem to provide a more ethical approach than the model offered by Finland to recruits with nursing background. In the German model, the Filipino nurses are trained as nurses in apprenticeship training and receive the pay of licensed nurses during the training.¹⁸² Some of the Filipino nurses recruited to Finland must obtain qualifications that are lower than their own and during the initial stages of the apprenticeship training, they may receive the minimum pay of a trainee, which will be reviewed as the tasks gradually become more demanding¹⁸³.

The fact that the option of apprenticeship-based nurse training is not available in Finland may be one reason why persons with nursing background are provided with lower-level education. Apprenticeship training is vocational upper secondary and further training.¹⁸⁴ Nursing degree (Bachelor of Health Care, Nursing) is a tertiary degree. The ministerial working group on health and social services has, however, adopted a policy decision emphasising that such persons as nurses recruited to Finland should primarily work as nurses¹⁸⁵.



The recruitment models used by health and social services companies are ethically more questionable than the Triple Win model.

Persons that have received their training outside the EU and the EEA can only be employed in licensed professions in a roundabout way

A job is a requirement for a work-based residence permit. Persons that have received their health and social services training outside the EU and the EEA cannot be directly granted a work-based residence permit for professions that correspond to their training but require licensing in Finland (such as nurses). They must first complete the additional training specified by Valvira before Valvira can grant them the right to work in licensed professions. However, the additional training must take place in Finland, which means that persons trained outside the EU and the EEA must apply for a work-based residence permit on other grounds (for example, for work in other professions).¹⁸⁶

However, persons that have received their health and social services training outside Finland can work in professions with protected occupational titles if the employer is of the view that the person in question possesses adequate training, experience, professional competence and language proficiency for the task in question¹⁸⁷. However, the person in question may not use a protected occupational title. In practice, persons trained as nurses or for any other licensed profession outside the EU and the EEA can only be employed in Finland’s health and social services in a roundabout way.

”
A person may work in a profession with a protected occupational title if the employer is of the view that the person in question can manage their professional duties.

An increasing number of applications for professional practice rights are submitted each year by persons that have received their health care training outside the EU and the EEA

The number of applications for professional practice rights submitted by persons that have received their health care training outside the EU and the EEA increased by 25 per cent between 2017 and 2021. Most of the applications concerned licensing granted on the basis of doctor’s and nurse’s training. Even though the number of applications for professions with protected occupational titles have increased they are still rare. (Table 4)

Table 4: Applications for licensing by doctors and nurses trained outside the EU and the EEA and for the right to use protected health care occupational titles by health care professionals trained outside the EU and the EEA in the period 2017–2021. Source: Valvira.¹⁸⁸

Applications	2017	2018	2019	2020	2021
Total	207	161	ca 180	ca 196	ca 259
Total number of licensings of which	199	152	ca 170	ca 188	ca 240
a) doctors	73	61	55	42	71
b) nurses	37	40	61	89	79
Rights to use protected occupational titles, total	8	9	10	8	19

The application submitted on the basis of training received outside the EU or the EEA does not always lead to licensing during the same year. This is because the decision on additional training is added to the application. Applications may also be rejected if the documents are incomplete or the applicant does not have the training leading to the profession in question. Some of the applicants may also cancel their applications. The matter may also expire if the required additional information is not provided on time. Valvira may also decide not to consider an application.¹⁸⁹

The automatic system of recognising professional qualifications only applies to five health care qualifications obtained in the EU or the EEA

The manner in which a person who has obtained a health and social services qualification outside Finland is licensed depends on the country in which the training was received and whether the training falls within the scope of automatic or general system of recognition. The course of the process also depends on at which stage the applicant presents a certificate of their Finnish or Swedish skills. (Figure 5.)

The automatic system of recognition applies to five health care qualifications, which have been made to correspond to each other at European Union level.¹⁹⁰ They are doctor, dentist, nurse, head dispenser and midwife. Under the system, applicants with any of these qualifications cannot be required to undergo an adjustment period or take an aptitude test.¹⁹¹ If the applicant does not meet the requirements for automatic recognition of professional qualifications, the provisions on the general system of recognition are applied.¹⁹² (Figure 5.)

Even though the professional qualification can be recognised before the applicant has presented the certificate of adequate language proficiency,¹⁹³ the recognition alone does not give the applicant the right to work as a licensed health care professional.¹⁹⁴ Before the final licensing, the applicant must present a certificate of adequate language proficiency because under Article 53 of the Professional Qualifications Directive, all licensed health services professionals can be required to present a language certificate in connection with the licensing process for reasons of patient safety.¹⁹⁵



Recognition of professional qualification does not entitle the holder to practice a regulated profession.

In the general system of recognition, the training may differ significantly from the training provided in Finland and the training received outside the EU and the EEA must correspond to Finnish training

The professions to which the general system of recognition applies are listed in section 8 of the Act on Health Care Professionals (559/1994). They are as follows:

- pharmacist
- physiotherapist
- dental technician
- laboratory technologist
- public health nurse
- optician
- psychologist
- speech therapist
- dietician
- radiographer
- oral hygienist and
- occupational therapist.

In the general system of recognition, the applicant's training is compared against the corresponding Finnish training. In the comparison, consideration is also given to the other competence acquired by the applicant.¹⁹⁶ In the assessment process, an expert opinion is requested from a Finnish training provider (university or university of applied sciences) if Valvira is unable to determine the essential differences between the training paths on the basis of the documents supplied to it. The applicant is licensed if the training does not essentially differ from the Finnish training and the applicant has submitted a certificate of language proficiency to Valvira. Otherwise, the licensing will only take place after the applicant has presented the language certificate.

If the applicant's training differs essentially from the corresponding Finnish training, a conditional decision on recognising the applicant's professional qualification is made.¹⁹⁷ In this decision, Valvira may decide that as a compensatory measure, the applicant must take an aptitude test or apply for the licensing after an adjustment period lasting for a maximum of three years.¹⁹⁸ The applicant will be licensed after they have successfully completed the compensatory measure and submitted the language certificate. Otherwise, the applicant's professional qualification is recognised but the licensing will only take place after the applicant has submitted the language certificate.

In the licensing of persons that have received their health care training in countries outside the EU and the EEA, applicants are always requested to provide additional information for their applications. When the differences between training paths are assessed, the requirement is that the applicant's training must correspond to the training provided in Finland for the same professional qualification. As a result, the applicants are always required to take additional studies.¹⁹⁹ The applicants are licensed after successfully completing the additional studies and submitting the language certificate.

In the automatic system of recognition, recognition of professional qualification takes an average of three months (minimum 30 days) and in the general system of recognition, an average of four months. Issuing the decision on additional studies based on training received outside the EU and the EEA takes at least four months.²⁰⁰ It is difficult to estimate how long it takes on average for Valvira to grant a person the right to practice a profession from the date on which Valvira has received the required documents to the date on which it makes the final decision on the professional practice rights. The overall duration of the process of granting the professional practice rights depends on how quickly the person in question completes the additional studies and submits the language certificate. For example, the licensing of a nurse, from the date on which the application is submitted to the granting of the right to practice the profession, may take between just over 10 months to almost six years.²⁰¹



The application processing time of between three and four months only applies to the first stage of the process of granting the right to practice a profession.

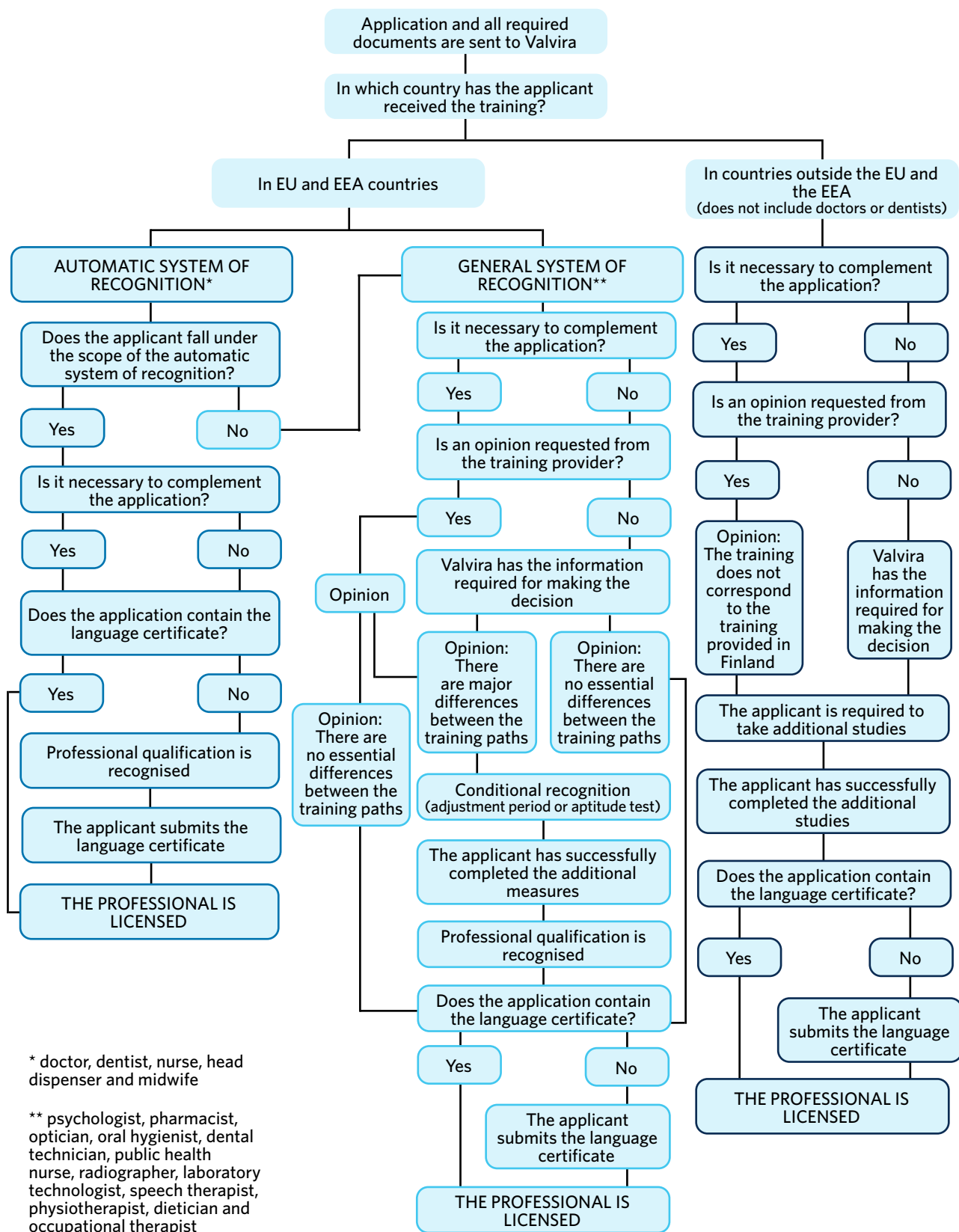


Figure 5: Different processes for granting the right to practice health care professions used by Valvira. The processes do not include the processes for licensing doctors and dentists.

There are no qualification paths for persons that have received their health care training outside the EU and the EEA

Finland does not provide any qualification paths for persons that have received their health and social services training outside the EU and the EEA, except for doctors and dentists.²⁰² Qualification training paths for health care professional groups have been developed in a number of projects in Finland. However, the training paths developed in these projects have not been put into practice. According to the audit findings, this is mainly due to the lack of permanent funding.²⁰³ Likewise, under the Act on Universities of Applied Sciences (932/2014), universities of applied sciences do not have any obligation to provide qualification training leading to licensing for persons that have received their training outside Finland.

In the absence of permanent funding, such paths as the qualification of nurses has continued with project funding.²⁰⁴ The Ministry of Education and Culture is proposing substantial additional funding for qualification training and qualification path for the fourth supplementary budget for 2022, and the Ministry of Social Affairs and Health is proposing addition funding for Valvira for streamlining the licensing path.²⁰⁵ The sub-working group of the programme on ensuring the adequacy and availability of health and social services personnel must also prepare a proposal during 2023 for the funding of the training supporting the licensing of foreign labour. During 2022 and 2023, the working group must also prepare an implementation plan for developing the licensing process and the qualification training supporting it and for putting them on a permanent basis.²⁰⁶ In October 2022, the Ministry of Education and Culture and the Ministry of Social Affairs and Health presented a joint proposal for streamlining the licensing process and for introducing the qualification training already in 2023.²⁰⁷



Project funding is used to compensate for the absence of permanent funding.

Insufficient language skills make it more difficult for immigrants to be employed in tasks in which licensing or the use of protected occupational titles is required

There are no specific legal provisions on what is meant by ‘sufficient language skills’.²⁰⁸ According to Valvira, the minimum proficiency level means level YKI3 demonstrated with the national certificate of language proficiency in all sectors.²⁰⁹ The requirement does not apply to persons that have received their doctoral training outside the EU and the EEA.²¹⁰ However, a person that has passed the YKI3 test is not yet qualified to work as an expert in tasks requiring Finnish skills.²¹¹

Under section 18a, subsection 1 of the Act on Health Care Professionals, a professional must have the language proficiency required in their tasks. However, there are health care tasks that do not involve regular contacts with patients. According to a Government proposal (HE 4/2020 vp), lower language proficiency requirements could be set for persons working in these tasks.²¹² This was also proposed in the interviews conducted for the audit.²¹³ However, Valvira requires that all persons that have received their training outside Finland must possess at least the same language proficiency before they can be licensed and receive the right to use protected occupational titles. Doctors are the only exception to this rule. Nevertheless, in the opinion it has submitted on the draft audit report, Valvira states that from the perspective of good employment opportunities, the language proficiency requirement should not be too strict.²¹⁴

However, insufficient language skills would rarely seem to be the main reason for intervention prompted by the conduct of professionals that have received their training outside Finland. In most of the situations requiring intervention, the professional qualification of the person in question has been recognised on the basis of the automatic system of recognition. Such cases usually involve inadequate clinical competence and the insufficient language skills may also be noticed in the same connection.²¹⁵

Checking the employee's language proficiency means additional costs for the employer

In health services, the employer is responsible for ensuring that the employee has the language proficiency required for their tasks.²¹⁶ Employers also incur costs from checking the language proficiency of persons recruited to Finland through health and social services recruitment companies after the persons have arrived in Finland. This is because the language training provided by health and social services companies in the countries of origin does not provide the skills that such actors as Valvira require from persons granted professional practice rights. There were also differences between the language proficiency requirements set by the health and social services recruitment companies whose representatives were interviewed for the audit²¹⁷, which means that there are also differences between the recruits' language proficiency.



There are different views of what is meant by sufficient language skills.

According to the audit findings, the costs incurred by the employers from the language training may be one factor making employers reluctant to hire employees with insufficient Finnish or Swedish skills.²¹⁸ A majority (58%) of the companies responding to the survey conducted for the audit were of the view that providing work-based immigrants with language training is the responsibility of the municipality, while 36 per cent were of the view that it is the employer's responsibility.

The audit findings also indicate that ensuring sufficient language skills can encourage work-based immigrants to stay in Finland.²¹⁹ According to the survey conducted by the National Audit Office among companies, language proficiency was one of the five factors that in the view of the respondents encourages immigrants to stay in Finland.

For more detailed audit findings concerning the recruitment and entry of health and social services workers, see the memorandum appended to the audit.



Majority of the employers responding to the survey are of the view that language training is a municipal responsibility.

5 Do persons moving to Finland on the basis of work and their families receive the integration and settling-in services they need and is the service system administered in an efficient manner?

Services that promote integration and settling in are a pull factor for Finland and they encourage work-based immigrants and their families to stay in Finland. Studies have shown that immigrant integration is an excellent investment.²²⁰

According to the audit findings, municipalities do not provide work-based immigrants with integration services. At the same time, however, municipalities have developed services supporting settling in Finland. Good practices developed with Talent Hub funding have improved the efficiency of the service system supporting work-based immigrants in large cities. The activities are not well-established in small municipalities.

Work-based immigrants are left without integration services

According to the Government report on the need for reforms in the promotion of integration, as the labour force is becoming more international in character, Finland must pay more attention to the settling in and integration of persons moving to Finland for work and studies.²²¹

In 2018, the Parliamentary Audit Committee drew attention to the fact that the integration services provided by municipalities and TE Offices are rarely offered to work-based immigrants. According to the audit findings, work-based immigrants are still left without integration services because municipalities are of the view that they are outside the scope of the Act on Immigrant Integration (HE 208/2022 vp). At the same time, large cities have promoted settling in Finland by placing official services under one roof in immigrant guidance and advisory points in accordance with the immigration policy programme published in 2018.

Good practices for organising settling-in services have been developed with Talent Hub funding

Good practices developed with Talent Hub funding have improved the efficiency of the service system for work-based immigrants in large cities. In addition to the guidance and advisory points, these also include voluntary settling-in plans and spouse programmes. According to cities, development work has also been successfully integrated into other services. Cities have the capacity to improve the settling-in services so that they would support more extensively the settling in and integration of persons that are moving to Finland on the basis of work and their families.²²² For example, the City of Helsinki is planning to provide the specialists arriving in Finland on the fast track with better services.²²³ However, the fact that central government funding for Talent Hubs has been reduced from three million to one million euros will force large cities to prioritise the activities.²²⁴

In small municipalities, however, all Talent Hub activities are still on a project basis and it remains to be seen whether municipalities will work to put the activities on a more permanent basis. More attention should also be paid to the integration and settling in of work-based immigrants and their family members outside large cities.

The proposal contained in the reform of the Act on Immigrant Integration stating that ELY Centres would be tasked with promoting settling in is justified from the perspective of the audit findings. Under the legislative proposal (HE 208/2022 vp), ELY Centres would be responsible for regional development, coordination, monitoring and supervision of the promotion of integration and settling in and cooperation in the sector.

According to the audit findings, the objective, set out in the 2018 immigration policy programme, that cooperation between recruitment companies, official services, organisations and private settling-in services should be strengthened has not been fully realised. It is not clear to the actors what is meant by settling in, how it differs from integration and how are the responsibilities divided between central government, local government, employers and immigrants. The proposal for a more detailed definition of settling-in services, contained in the Government proposal for promoting immigrant integration (HE 208/2022 vp), is justified on the basis of the audit.



Even though the settling-in services were outlined in the 2018 immigration policy programme, the concept remains unclear to actors.

Electronic remote registration in the country of origin would speed up settling in Finland

The aim set out in the 2018 immigration policy programme that settling in could already start in the country of origin has not yet become a reality. Strong identification is required in official services, which in turn requires a personal visit to an official service point in Finland. Substantial improvements in administrative efficiency can only be achieved if electronic identification is introduced in all immigration-related services. According to the companies' own experience, employees may have to wait for their personal identity codes for up to two months. As a result, the opening of a bank account and wage payments are also delayed.

In the Virtual Finland project between 2021 and 2025, which is led by the Ministry for Foreign Affairs, the aim is to create a digital immigration service infrastructure for Finland that would facilitate the entry and settling in of entrepreneurs, employees and students. A total of four million euros has been allocated to the project from the European Recovery and Resilience Facility (RRF).²²⁵ Finland is also providing the project with two million euros in national funding.²²⁶

In autumn 2022, Parliament was considering a Government proposal for legislation on digital identity and the Government proposal for the act amending the Act on the Population Information System and the certificate services of the Digital and Population Data Services Agency. One aim of the proposals is to ensure that foreigners are able to log in to electronic services on an equal basis and to allow electronic remote registration procedure.²²⁷ The proposed amendments should enter into force on 1 September 2023. According to the audit findings, the reforms would help to make the administration of work-based immigration more efficient and streamline the entry of work-based immigrants to Finland.

For more detailed audit findings concerning the integration and settling in of work-based immigrants, see the memorandum appended to the audit.

Appendix 1: Audit methods



This appendix describes how the findings presented in the audit were produced and what are the limitations concerning them.

Purpose and objective of the audit

The objective of the audit was to examine the activities and goals concerning work-based immigration, efficiency of the administrative processes, customer orientation and the functioning of the cooperation between government agencies. In the audit of the sectors facing labour shortages, the focus was on health and social services, and matters concerning the entry into the country of health and social services employees.

The purpose of the audit was to produce essential information for Parliament and the public administration. A number of projects to improve the system of work-based immigration are under way in the public administration. The development work carried out by the public administration will benefit from the identification of key development priorities and workable good practices in the audit and from the new information on the subject produced in the audit. Parliament will benefit from the information produced by the audit when assessing the feasibility of the legislative measures focusing on the system.

Audited entity

The audit covered the long-term measures taken by the government agencies responsible for work-based immigration. Active immigration policy has been listed as an instrument boosting economic growth and employment in the Government's strategy documents since 2005. In the audit of the functioning of the permit process in work-based immigration, the focus was on the years 2021 and 2022.

The following entities were asked to submit opinions on the draft audit report: Ministry of Economic Affairs and Employment, Ministry of the Interior, Ministry of Social Affairs and Health, Ministry for Foreign Affairs, Ministry of Education and Culture, Ministry of Finance, Finnish Immigration Service, National Supervisory Authority for Welfare and Health (Valvira), Digital and Population Data Services Agency and Statistics Finland. Opinions were submitted by all these entities, except for the Ministry of Education and Culture.

The feedback contained in the opinions was taken into account in the preparation of the final audit report. The opinions and the abstract based on them can be viewed on the website of the National Audit Office.

Audit questions and criteria

The questions asked in the audit and the audit criteria are presented below. The audit provides answers to all audit questions presented in the audit plan but they have been partially revised and they are not reported in the same order as in the audit plan.

Audit question 1: Have government agencies developed and carried out their activities in the field of work-based immigration in accordance with the objectives set?

Criteria:

- The objectives for work-based immigration and the manner in which the activities are steered are identical. The work to achieve the objectives is coordinated on a cross-administrative basis. The entities involved share the objectives and they are committed to achieving them on a cross-administrative basis.
- The activities of the government agencies dealing with work-based immigration have been organised in an appropriate manner and there is a clear division of responsibilities between them.
- Monitoring data that is adequate from the perspective of foresight, planning and the activities themselves is produced on work-based immigration on a systematic basis. Access to and use of the statistical and research data on immigration has been developed in accordance with the objectives. Foresight work is carried out on a regular basis, especially in the field of strategic labour force sectors. For example, anticipation of the need for foreign labour in health and social services has been developed so that it is known from where and how professional personnel can be best recruited, considering the requirements concerning professional practice rights, qualifications and language skills.

Sources for the criteria:

- Maahanmuuton tulevaisuus 2020 (Future of immigration 2020) strategy and action plan; Work in Finland – Government Migration Policy Programme to Strengthen Labour Migration; Programmes of the Governments of Prime Minister Antti Rinne and Prime Minister Sanna Marin; Roadmap for Education-based and Work-based Immigration; Talent Boost programme; Work-based immigration, NAOF's audit report 13/2012 and audit follow-up report 13 October 2014; Criteria for good governance, section 10 of the Administrative Procedure Act and HE 72/2002 vp; Tulostohjauksen yhteiset periaatteet (Joint principles of performance management), VM 21/2012.

Audit question 2: Have measures been taken to ensure an efficient and customer-oriented permit and service system for work-based immigration?

Criteria:

- Quick and smooth processing of work-based residence permits has been ensured. Transfer of the administration of work-based immigration to the Ministry of Economic Affairs and Employment has made the processing of residence permit applications more efficient. The quantitative targets for permit processing times set for 2021 have been achieved. Division of labour and responsibilities in immigration administration are clear and cross-administrative cooperation is on an efficient basis.

- Customers (international experts and employers) consider the permit process smooth and quick and the authorities have provided them with guidance and advice on the matter. Permit processes have been speeded up by strengthening the network of Finland’s diplomatic missions and by reducing the bottlenecks affecting the processes.

Sources for the criteria:

- Work in Finland – Government Migration Policy Programme to Strengthen Labour Migration; Programmes of the Governments of Prime Minister Antti Rinne and Prime Minister Sanna Marin; Maahanmuuton tulevaisuus 2020 (Future of immigration 2020) strategy; Roadmap for Education-based and Work-based Immigration; Talent Boost programme and its objectives; objectives of the Talent Hub grants; Budget, main title of the Ministry of the Interior, operating expenses of the Finnish Immigration Service and state-owned reception centres: Quantitative targets for the duration of the permit process for 2021; Parliamentary Audit Committee report: Kotouttamisen toimivuus (Functioning of integration); sections 7 and 8 of the Administrative Procedure Act (434/2003).

Audit question 3: Have the objectives for the development of a customer-oriented permit and service system been achieved in the case of health and social services employees?

Criteria:

- The permit process for persons coming to Finland to work in health and social services and their family members is quick and smooth. Skills of the employees already in the country are recognised, they are able work in tasks corresponding to their training and they have the opportunity to supplement their skills in Finland. They have the opportunity to acquire the language proficiency required in the profession.

Sources for the criteria:

- Maahanmuuton tulevaisuus 2020 (Future of immigration 2020) strategy; Programme of the Government of Prime Minister Sanna Marin; Parliamentary Audit Committee report: Kotouttamisen toimivuus (Functioning of integration).

Audit question 4: Do persons moving to Finland on the basis of work and their families receive the integration and settling-in services they need and is the service system administered in an efficient manner?

Criteria:

- Active integration of international experts and their families into Finnish society has been strengthened, made more efficient and speeded up. Settling-in and integration services have been improved and they are efficient from the public administration’s perspective. Families are provided with services in English.

Sources for the criteria:

- Programme of the Government of Prime Minister Sanna Marin; Parliamentary Audit Committee report: Kotouttamisen toimivuus (Functioning of integration); objectives of the Talent Boost programme and Talent Hub grants.

Audit target organisations were heard on matters concerning the audit design and audit criteria during the audit planning stage. The hearings did not warrant any changes to the audit design or the audit criteria.

Audit material and methods

The audit material consisted of 38 interviews with experts and representatives of companies and government agencies conducted during the planning and the audit stage (see Appendix 2), three surveys, information requests submitted to government agencies and statistics (especially statistical data produced by the Finnish Immigration Service). The written material consisted of official documents, legislation and statute drafting documents, studies and reports.

The surveys were conducted among companies, project actors and Finnish diplomatic missions. A total of 36 companies in 17 sectors responded to the survey questions sent on 29 March 2022. Ten of the companies operated in the industrial sector. With the exception of Åland, there were respondents in all regions. Most of the respondents (60%) were from Uusimaa. Of the companies, 13 were large enterprises, 11 micro enterprises, 8 small enterprises and 4 medium-sized enterprises. In the first stage, the survey questions were distributed via the Finland Chamber of Commerce to regional chambers of commerce. In the second stage, the survey questions were distributed through social media, Finnish Association of Private Care Providers and the ELY Centre for Ostrobothnia. The responses were submitted anonymously and the survey link could be shared. Because of the distribution method, the response rate is not known.

A total of 37 projects with aims related to work-based immigration were selected for the project actor survey. The survey questions were sent on 3 May 2022. Of the projects, 11 were connected with Talent activities and in the other projects, the aim has been to develop guidance and advisory services for immigrants. A total of 28 projects submitted responses, which means that the response rate was 76 per cent.

In July 2022, survey questions were sent to 17 Finnish diplomatic missions in countries where most of the applications for work-based residence permits have been submitted. The diplomatic missions were asked to submit their responses by 31 August 2022. Responses from 16 respondents in 15 diplomatic missions were received by the deadline.

Information requests were sent to immigration directors of ELY Centres, Local Government and County Employers KT, Finnish Immigration Service, Finnish National Agency for Education, Ministry of Education and Culture, Ministry of Economic Affairs and Employment and Valvira.

Qualitative content analysis and quantitative descriptive analysis were used to analyse the audit material.

Audit process

The audit was carried out between 20 December 2021 and 14 December 2022.

The audit material was collected between January and October 2022.

Auditors

The audit was carried out by Principal Performance Auditors Sari Hanhinen and Mikko Koskinen, Performance Audit Counsellor Taina Rintala and Project Adviser Sari Aroalho. Principal Performance Auditor Liisa Kähkönen participated in the project between 1 and 31 January 2022. Sari Hanhinen acted as the Project Manager and Deputy Director Vesa Koivunen as the project owner.

Appendix 2: Interviews conducted for the audit



Interviews conducted during the planning stage, autumn 2021

Business Finland, Confederation of Finnish Industries, City of Helsinki, Local Government and County Employers KT, Finnish Immigration Service, Moniheli, Ministry of Education and Culture, Ministry of the Interior, Ministry of Social Affairs and Health, Central Organisation of Finnish Trade Unions SAK, National Union of University Students in Finland, Suomen Yrittäjät, Tehy, City of Turku, Ministry of Economic Affairs and Employment, Ministry for Foreign Affairs, ELY Centre for Uusimaa and Uusimaa TE Office.

Interviews conducted during the audit stage, spring 2022

Attendo, Barona, City of Espoo (Talent Boost activities), City of Helsinki (Talent Boost activities), Finnish Association of Private Care Providers, Centre of expertise for immigrant integration, Finnish Immigration Service, Mehiläinen and Healthcare Staffing Solutions, ELY Centre for North Savo, Silk Road, City of Tampere (Talent Boost activities), Statistics Finland, Metropolia University of Applied Sciences (TOKASA project), City of Turku (Talent Boost activities), Valvira, ELY Centre for Southwest Finland and Southwest Finland TE Office.

Interviews conducted during the audit stage and presentation of the main audit findings to target organisations, autumn 2022

Aalto University, Business Finland, Finnish Immigration Service, Ministry of Social Affairs and Health, Ministry of Economic Affairs and Employment, Ministry for Foreign Affairs and Valvira.

References



- 1 Parliamentary Audit Committee Report TrVM 6/2018 vp. Kotouttamisen toimivuus (Functioning of integration).
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