

Asia: VN/24207/2023

Luonnos hallituksen esitykseksi eduskunnalle ulkomaalaislain muuttamisesta ja eräksi siihen liittyviksi laeiksi

Ehdotuksen suoja-aika, jona aikana oleskelulupaa ei saisi peruuttaa, kun työntekijä jää työttömäksi / The proposed term of protection during which a residence permit of an employee who has become unemployed could not be withdrawn

Antaako sääntelyehdotus riittävän pitkän suoja-ajan etsiä uusi työpaikka?

Does the proposed regulation provide a sufficiently long term of protection for holders of work-based residence permits to find a new job?

Ei / No

Perustelut vastaukselle ja muut mahdolliset huomiot sääntelyehdotuksesta

Statement of reasons for the response and other possible comments on the proposed regulation

Having gone through double immigration process in Denmark as international student and in Finland as a spouse to Finnish partner, I have looked for jobs more than six month. Statistically it takes longer to look for a job for immigrants and internationals. This is a clear message to leave Finland and does not allow jobseekers to get jobs.

Consulting areas like Kuusamo, Posio, Taivalkoski, Helsinki; Espoo, Vantaa I have a first hand perspective to how Finnish communities, companies, universities are struggling to integrate and retain every talent who can grow Finnish companies and bring revenue.

1. This is the economic times that push a hard pressure for all but factually immigrants suffer more due to barriers.

2. The pressure is on families, children and all people who invested in Finnish housing, so it is strongly against any Employer recommendations such as Business Finland or Ascham who are trying to bring investments to Finland and with which mobility of labor is absolute a demand for all investors. This proposal is irresponsible towards Finnish taxpayers too because it allows currently for all immigrants to leave and internationals who benefited from studying here and whose kids went to daycare and schools. They deserve the right to stay and to be valid members of Finnish society.

3. There is a workforce shortage from teachers to social workers to specialists and 3-6 months must be increased to at least one year to give time to reeducate, upskill or find another job that fits one's competencies. Also move to another location (from Helsinki to Kuusamo, from Oulu to Jyväskylä and so on as example where regional unemployment situation is different)

Työnantajan ilmoittamisvelvollisuus, kun työntekijän työt loppuvat, ja siihen liitettävä sanktion uhka / Employer's obligation to notify when the employee's work ends and the related threat of sanction

**Onko esitys ilmoittamisen määräaajoista 7/10 päivää riittävä?
Is the proposed time limit of 7/10 days for notifications sufficient?**

Ei / No

**Perustelut vastaukselle ja muut mahdolliset huomiot sääntelyehdotuksesta
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Such demand creates fear for both employees and employers, it allows employers to abuse power since this can be a way for foreign employee feel in a vulnerable position. This has to be done so it is able to establish a fair chance to discuss from both sides employee or employer. Also in the register and tax register, much data is readily available and in this case, the lack of income should be a good signal to Migri regarding the work situation.

Having this responsibility put on employer jeopardizes employee discretion and freedom and as we see with Berry pickers, a lot of power and abuse continues due to the lack of power from weaker-positioned employees from Thailand.

The better solution is to get in touch with employee, and employer differently without pushing the responsibility on the employer. Let data do their job to check the income and then contact employer yourself.

Onko voimassa olevan sanktiosääntelyn (esim. ulkomaalaislain 186-189 §, rikoslaki) soveltaminen riittävää ilmoittamisvelvollisuuden laiminlyönnistä?

Is the application of the current regulation on sanctions (e.g. sections 186-189 of the Aliens Act, Criminal Code) sufficient for cases where the duty to notify has been neglected?

Ei / No

**Perustelut vastaukselle ja muut mahdolliset huomiot sääntelyehdotuksesta
Statement of reasons for the response and other possible comments on the proposed regulation**

I am against that employer should be responsible as I mentioned the abuse of power is clear as with the case of Thai berry pickers. Humiliation, retaliation and fear of being fired will keep the person be in a potentially bad treatment and not leaving other options for jobseekers precarious condition in Finland. This is inhumane treatment.

Työnteko-oikeuden laajentaminen työvoimapula-aloille ja asetuksenantovaltuutus / Extension of the right to work to sectors suffering from labour shortages and the authorisation to issue decrees

Mahdolliset huomiot sääntelyehdotuksesta **Possible comments on the proposed regulation**

one year visa for job search should be realistic. The industrial backbone of Finnish economy is suffering and while startup communities are already divesting their R&D investments elsewhere in light of Finnish tightening immigration, looking for jobs become more difficult. However one year grant of visa is enabling parents, students, researchers to secure a fair way and continue their pursue of Finnish life and work life balance in line as with other Finns. This is the only way of Finnish way being fair - to give fair chance to all and to secure retention of international and immigrant employees in Finland.

Muuta lausuttavaa esityksestä / Other comments on the proposal

Mahdolliset muut huomiot esityksestä **Possible other comments on the proposal**

As an immigrant coach, DEI consultant, policy advocate with Nordic focus I work with Nordic competitiveness also in the European context.

The comment to proposal is informed by my 7 years entrepreneur journey in Finland, Talent boost ecosystem member and project member.

The Finnish companies in Taivalkoski and in Tampere or in Turku deserve access to best talent. The proposal must ensure interest of employers and not politically driven agenda, interest of employers to hire talent for their economic activity and paying taxes. Similarly the proposal should be Finnish-centric and ensure the talents who are in Finland being students or IT specialists or Nurses have more reason to stay in Finland and pay taxes here. Not to Denmark not to Norway not to Germany. As a tax payer in Finland I find this proposal going against any values that I feel my taxes are not used for betterment of Finnish welfare but the betterment of other states that offer better immigration paths and employment.

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