



# UNHCR

United Nations High Commissioner for Refugees  
Haut Commissariat des Nations Unies pour les réfugiés

## UNHCR Representation for the Nordic and Baltic Countries

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## Observations on the Government report on the need to reform integration in Finland

### 1. INTRODUCTION

UNHCR Representation for the Nordic and Baltic Countries (RNB) is grateful for the opportunity to provide observations on the Government Report on the need to reform integration in Finland (further referred as Report) as a basis to develop comprehensive integration action plan.

UNHCR offers the following observations in its capacity as the Agency entrusted by the United Nations General Assembly with the mandate to provide international protection to refugees<sup>1</sup> and, together with governments, seek permanent solutions to the problems of refugees,<sup>2</sup> UNHCR has a direct interest in the field of asylum and integration. According to its Statute, UNHCR fulfils its mandate *inter alia* by “[p]romoting the conclusion and ratification of international conventions for the protection of refugees, supervising their application and proposing amendments thereto[.]”.<sup>3</sup> UNHCR’s supervisory responsibility is reiterated in Article 35 of the 1951 Convention<sup>4</sup> and in Article II of the 1967 Protocol relating to the Status of Refugees<sup>5</sup>. UNHCR’s supervisory responsibility is also formally recognized under European Union law, including by way of a general reference to the 1951 Convention in Article 78(1) of the Treaty on the Functioning of the European Union (TFEU).<sup>6</sup>

UNHCR’s interest and engagement in integration stems from its mandate to seek durable solutions and from Article 34 in the 1951 Refugee Convention<sup>7</sup> (hereafter “the 1951 Convention”), which sets out that States shall, as far as possible, facilitate the integration and naturalization of refugees. Complementing this article are various soft law and policy documents related to integration, such as UNHCR’s Executive Committee (hereafter “ExCom”) Conclusion No. 104 on Local Integration<sup>8</sup> and its 2009 note on strategic approaches for combating discrimination.<sup>9</sup>

The logic of the 1951 Convention framework is that, with the passing of time, refugees should be able to enjoy a wider range of rights as their association and ties with the host country grow

<sup>1</sup> ‘Refugees’ in these observations refers to all persons of concern to UNHCR, including asylum seekers and (resettled) refugees.

<sup>2</sup> UN General Assembly, *Statute of the Office of the United Nations High Commissioner for Refugees*, 14 December 1950, A/RES/428(V) (hereafter “UNHCR Statute”), available at: <http://www.refworld.org/docid/3ae6b3628.html>.

<sup>3</sup> *Ibid.*, para. 8(a).

<sup>4</sup> UN General Assembly, *Convention Relating to the Status of Refugees*, 28 July 1951, United Nations, Treaty Series, vol. 189, p. 137, available at: <http://www.refworld.org/docid/3be01b964.html>.

<sup>5</sup> UN General Assembly, *Protocol Relating to the Status of Refugees*, 31 January 1967, United Nations, Treaty Series, vol. 606, p. 267, available at: <http://www.refworld.org/docid/3ae6b3ae4.html>.

<sup>6</sup> European Union, *Consolidated version of the Treaty on the Functioning of the European Union*, 26 October 2012, OJ L. 326/47-326/390; 26.10.2012, available at: <http://www.refworld.org/docid/52303e8d4.html>.

<sup>7</sup> UN General Assembly, *Convention Relating to the Status of Refugees*, 28 July 1951, United Nations, Treaty Series, vol. 189, p. 137, available at: <http://www.refworld.org/docid/3be01b964.html>.

<sup>8</sup> UN High Commissioner for Refugees (UNHCR), *Conclusion on Local Integration No. 104 (LVI) - 2005*, 7 October 2005, No. 104 (LVI) 2005, available at: <http://www.refworld.org/docid/4357a91b2.html>

<sup>9</sup> UN High Commissioner for Refugees (UNHCR), *Combating Racism, Racial Discrimination, Xenophobia and Related Intolerance through a Strategic Approach*, December 2009, available at: <http://www.refworld.org/docid/4b30931d2.html>

stronger. In this sense, the 1951 Convention gives refugees a solid basis on which they can progressively regain the social and economic independence needed to get on with their lives. ExCom Conclusion No. 104 calls on States to facilitate the integration of refugees and provides guidance on special efforts that may be necessary. Facilitating the integration of refugees in their new home country is a priority area for UNHCR's advocacy and capacity building activities in the Northern Europe region, including in Finland.

Supporting and promoting sustainable integration at the local level through social cohesion and equal opportunities is a key objective of the Global Compact on Refugees (GCR),<sup>10</sup> the EU's proposed New Action plan on Integration and Inclusion 2021-2027<sup>11</sup> (as part of the EU's Pact on Migration and Asylum) and The Three-Year Strategy (2019-2021) on Resettlement and Complementary Pathways.<sup>12</sup> The importance and contribution of effective integration of refugees and third-country nationals legally residing in Member States to the building of inclusive, cohesive, and prosperous societies has been recognized at all levels of the European Union<sup>13</sup>. Integration requires appropriate investments of time and resources from States, local authorities, the private sector, and civil society, which all have a key role to play in supporting integration in addition to the efforts required from refugees themselves. Intensifying joint efforts and increased focus on countering intolerance and xenophobia against asylum-seekers and refugees is likewise required.

## 2. OBSERVATIONS

### 2.1 Overall observations

Finland has a strong tradition of providing sanctuary to persons in need of international protection and is a strong supporter of the international protection regime and the work of UNHCR. Over the past years, Finland has reinforced its comprehensive approach to integration by further strengthening labour market inclusion policies, refugee/immigrant participation, anti-discrimination mechanisms and introducing Community Sponsorship<sup>14</sup> which will further consolidate existing integration efforts and engage civil society into existing comprehensive integration framework.

UNHCR wishes to welcome Government's commitment to further strengthen integration of refugees and immigrants in Finland by initiating the review of the integration system and engaging all relevant actors in the consultation process, where improvements may be foreseen. As the report on the need to reform integration in Finland covers all immigrants, including beneficiaries of international protection, and is based on the overall vision to streamline integration services in to mainstream system, UNHCR thus wishes to deliver general observations for the consideration of the Ministry of Economic Affairs and Employment.

### 2.2 Participation

UNHCR welcomes Finland's overall holistic approach to integration, including the definition of integration ('Act on the Promotion of Immigrant Integration', 1386/2010) which emphasizes a 'two-way' process between refugees and host communities. The Report focuses on various integration areas, opportunities and challenges. However, in line with the definition of integration which is defined in the 'Act on the Promotion of Immigrant Integration', the Report

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<sup>10</sup> UN General Assembly, Report of the United Nations High Commissioner for Refugees, Part II, Global compact on refugees, A/73/12, New York, 2018, available at: <https://www.unhcr.org/excom/unhcrannual/5ba3a5d44/report-united-nations-high-commissioner-refugees-part-ii-globalcompact.html>.

<sup>11</sup> Action plan on Integration and Inclusion 2021-2027, European Commission, available at: [https://ec.europa.eu/home-affairs/sites/homeaffairs/files/pdf/action\\_plan\\_on\\_integration\\_and\\_inclusion\\_2021-2027.pdf](https://ec.europa.eu/home-affairs/sites/homeaffairs/files/pdf/action_plan_on_integration_and_inclusion_2021-2027.pdf)

<sup>12</sup> The Three-Year Strategy (2019-2021) on Resettlement and Complementary Pathways, June 2019, available at <https://www.unhcr.org/protection/resettlement/5d15db254/three-yearstrategyresettlement-complementary-pathways.html>

<sup>13</sup> European Commission, EU policy framework for migrant integration, available at: <https://ec.europa.eu/migrant-integration/the-eu-and-integration/framework>.

<sup>14</sup> The term Community Sponsorship' describes programmes where individuals or groups of individuals come together to provide financial, emotional and practical support toward reception and integration (UNHCR, 'Complementary Pathways for Admission of Refugees to Third Countries: Key considerations' (April 2019) available at <https://www.refworld.org/docid/5cebf3fc4.html>)

would benefit from strengthening the fact that integration is a ‘two-way’ process<sup>15</sup> as in most cases the Report focuses on the labour market, employment, labour market needs and demographic situation, while issues related to mental and physical health, self-reliance and self-resilience, participation and engagement are less developed.

Referring to ExCom Conclusion No. 104,<sup>16</sup> the UNHCR notes that the Report focuses on integration services and support for immigrant population, including refugees, without emphasizing the *agency* – pro-active engagement of refugees and their communities. In most cases, refugees and immigrants are considered as passive receivers (beneficiaries) of various services rather than active co-designers and co-implementers of various integration programmes and initiatives. UNHCR welcomes the extensive consultation process which has been initiated in the framework of the development of this Report. The process engaged civil society and local communities, refugee and immigrant organizations as well as other relevant actors. However, the Report does not sufficiently emphasize the pro-active engagement of the target group, including the important synergies between the development of various integration measures and action plans on one hand, and existing dialogue platforms for participation (such as the National Advisory Board for Ethnic Relations and its regional settings) on the other hand.

Immigrant and refugee pro-active engagement is relevant to foster participation in the planning, design, implementation and evaluation of goals and actions concerning programmes which supports their integration. Additionally, it is relevant to address existing narrative and public discourse around asylum, migration and integration issues in Finland and beyond, where refugees and immigrants are seen as significant contributors not just to integration programmes, but also to more broader topics, including gender equality, Sustainable Development Goals, democracy, other. UNHCR welcomes in particular that Finland has reinforced mechanisms to foster immigrant and refugee participation, including strengthening national consultative body and developing regional advisory boards. UNHCR further welcomes that the Report discusses questions related to immigrant participation, including the development of ‘National Democracy Program 2025’, where various social and ethnic groups (including immigrants) will be included in new consultation and involvement procedures. It is UNHCR’s understanding that the principle of participation is fundamental for integration work in Finland. However, the Report does not explicitly indicate how refugee and immigrant participation will be ensured in the most relevant integration environment – local level integration ‘ecosystem’. UNHCR, thus, recommends a strengthening of Report’s language on refugee and immigrant engagement by lifting participation from passive actions (such as informing, consulting and involving) to active measures – collaboration and empowerment.<sup>17</sup> Age, Gender and Diversity (AGD) and participatory approaches have been a priority for UNHCR’s work in Finland since the dialogue with refugee women in Finland in 2011<sup>18</sup> and the follow-up publication ‘Speaking for Ourselves’,<sup>19</sup> which highlights good practices in Finland concerning refugee participation in the planning, design and implementation of activities that have an impact on their lives, families and communities. Such participation can add significant value particularly when made available to all groups in an AGD sensitive manner.

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<sup>15</sup> UNHCR continues to rely on ExCom Conclusion No. 104, which focuses on the synergy of legal, economic, social and cultural dimensions and defines integration as a *dynamic and multifaceted two-way process leading to full and equal membership in society. This includes preparedness by refugee communities to adapt to host societies without giving up cultural identity, and the receiving communities and institutions equally ready to welcome refugees and meet the needs of a diverse population. The process is complex and gradual, comprising legal, economic, social and cultural dimensions* (Conclusion on Local Integration, No. 104 (LVI) – 2005, Executive Committee 56th session, available at: <https://www.unhcr.org/excom/exconc/4357a91b2/conclusion-local-integration.html>)

<sup>16</sup> Conclusion on Local Integration, No. 104 (LVI) – 2005, Executive Committee 56th session, available at: <https://www.unhcr.org/excom/exconc/4357a91b2/conclusion-local-integration.html>

<sup>17</sup> Levels of refugee community’s participation or engagement are categorized according to the so-called ‘ladder of community engagement.’ This method is used by UNHCR in different contexts, in particular, it was used in relation to Global Compact on Refugees refugee consultations in 2017 (Refugee Voices in the Global Compact on Refugees, 2017’. Based on Sherry R. Arnstein’s. ‘A Ladder of Citizen Participation,’ Journal of the American Planning Association, Vol. 35, No. 4, July 1969, available at: <https://www.participatorymethods.org>).

<sup>18</sup> UN High Commissioner for Refugees (UNHCR), Protectors, Providers, Survivors: A Dialogue with Refugee Women In Finland, October 2011, available at: <https://www.refworld.org/docid/4ec4aa3f2.html>

<sup>19</sup> UN High Commissioner for Refugees (UNHCR), Speaking for Ourselves: Hearing Refugee Voices, A Journey Towards Empowerment, May 2014, available at: <https://www.refworld.org/docid/537afd9e4.html>

### 2.3 Healthcare and Covid-19 Pandemic

The Report covers all key integration areas, including refugee and immigrant healthcare; However, healthcare received not enough attention in the sections, where the situation analysis is described and integration measures are foreseen. UNHCR notes that healthcare is particularly relevant for refugee communities as due to displacement and trauma refugees might face multiple disadvantages of having both mental and physical health challenges, which further have an impact on labour market integration outcomes, education and networks with the local population. Refugee and immigrant healthcare is especially relevant in the context of Covid-19 Pandemic.<sup>20</sup> UNHCR notes that the Report does not address the specific challenges of the Covid-19 Pandemic and its impact on long and short-term integration outcomes, including labour market indicators, mental health, support to refugee and immigrant children in distance learning environment and other (potential) challenges that might occur in a long run. As the Covid-19 pandemic has served to underscore the need for holistic and flexible approach to integration and, at the same time, highlighted a range of challenges and opportunities for integration, UNHCR recommends to address these issues in the situation analysis of the Report and in the sections dealing with planning of integration measures, including vaccination plans and culturally sensitive information campaigns.

### 2.4 Labour market inclusion and entrepreneurship

UNHCR welcomes the Report's strong emphasis on the labour market inclusion and economic self-reliance, which has received significant attention with detailed situation analysis and explicitly indicated measures. UNHCR notes that recent Global Refugee Forum's pledges by private sector to hire refugees<sup>21</sup> underscore an encouraging interest in refugee labour market inclusion by recognising significant benefits of a diverse workforce, including a clear business case for the hiring of refugees. Additionally, this momentum creates a strong background to address narratives and public discourses around asylum and refugee integration issues in Finland and beyond in the Nordic Countries. UNHCR, therefore, recommends to develop measures and guidelines for proactive engagement of employers not only as providers of employment opportunities, but also as relevant integration actors, including holistic Diversity and Inclusion policies, language training and sociocultural orientation courses at the work place, which should be streamlined in organizational 'culture', rather than implemented in the frame of project-based activities.

As part of IKEA's Global refugee Pledge to support 2,500 refugees through job training and language skills initiatives in 300 stores and units in 30 countries, UNHCR cooperates with IKEA Finland and Finnish Refugee Council to facilitate and support refugee labour market inclusion in Finland.<sup>22</sup> UNHCR's 2019-2023 Global Strategy Concept Note on Refugee Livelihoods and Economic Inclusion<sup>23</sup> lays out the rationale for engaging in refugees' economic inclusion and how to work towards an inclusive market system, while UNHCR's and OECD's 10 Point Action Plan to promote the hiring of refugees<sup>24</sup> provides clear guidelines for the private sector and other integration stakeholders to be actively engaged in the provision of employment and training opportunities for refugees.

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<sup>20</sup> More available at UNHCR Website on Covid-19 situation: <https://reporting.unhcr.org/covid-19>

<sup>21</sup> 'Private sector pledges US\$250 million in refugee assistance'. Ikea, The Lego Foundation and Vodafone lead 30 organizations at the Global Refugee Forum promising education, training, jobs, legal services and cash assistance to refugees. Available at: <https://www.unhcr.org/news/latest/2019/12/5df7ba8d4/private-sector-pledges-us250-million-refugee-assistance.html>

<sup>22</sup> Ikea hires dozens of refugees to Finnish department stores - "They are particularly vulnerable in the labor market", available at: <https://www.tellerreport.com/news/2021-01-14-%0A---ikea-hires-dozens-of-refugees-to-finnish-department-stores---%E2%80%9Cthey-are-particularly-vulnerable-in-the-labor-market%E2%80%9D%0A--HkZUvsiaCP.html>

<sup>23</sup> Refugee Livelihoods and Economic Inclusion. 2019-2023 Global Strategy Concept Note. Available at:

<https://www.unhcr.org/publications/operations/5bc07ca94/refugee-livelihoods-economic-inclusion-2019-2023-global-strategyconcept.html>

<sup>24</sup> OECD, UNHCR (2018). Engaging with employers in the hiring of refugees. A 10-point multi-stakeholder action plan for employers, refugees, governments and civil society. Available at:

<https://www.unhcr.org/protection/livelihoods/5adde9904/engagingemployers-hiring-refugees-10-point-multi-stakeholder-action-plan.html>

UNHCR, however, notes that in the context of labour market inclusion measures, refugee and immigrant entrepreneurship has not received enough attention. The Report does not explicitly indicate how refugee and immigrant entrepreneurial skills and potential of self-employment could be used not only as a tool to increase employment and boost the culture of small scale enterprises, but also to build self-reliance and self-esteem of the most vulnerable refugee and immigrant groups as well as use sociocultural resources in the Finnish entrepreneurial ‘ecosystem’. Existing practices in Finland and other Nordic Countries<sup>25</sup> as well as the ‘Policy Guide on Entrepreneurship for Migrants and Refugees’<sup>26</sup> jointly developed by UNHCR, IOM and UNCTAD could serve as guidelines which highlight the positive effects and potential of refugee entrepreneurship on integration outcomes and social innovations, economic growth and development.

### *2.5 Local level integration*

UNHCR in particular welcomes the Report’s strong focus on local level integration and engagement of municipalities, including intersectional cooperation, coordination and mainstreaming of integration services, which are key elements to further develop sustainable integration systems for refugees, immigrants and native-born population in Finland. UNHCR recommends to involve refugees and immigrants in the design, implementation and evaluation of integration programmes through capitalizing on already existing participatory tools<sup>27</sup> from national/regional to a local level. Participatory approach at the local level should be used not only to collect the views of refugees on the quality of integration services, but also to develop a crosscutting approach, where key participatory principles should be applied by developing procurement procedures for organising integration training (subchapter 10.3.2). UNHCR further recommends that such (or other) integration training should target people with immigrant and refugee background to become service providers, including social workers and mentors, volunteer networks’ coordinators and language trainers. From UNHCR experience, engagement of people with immigrant and refugee background in the provision of integration services creates positive integration outcomes.

By further capacitating local level integration actors, UNHCR recommends to explore possibilities to expand partnerships between local authorities and international networks, including Council of Europe’s Intercultural Cities Programme<sup>28</sup> (ICC) with the aim to strengthen capacities of cities to welcome refugees and immigrants as well as consolidate local level integration action planning, including knowledge sharing and evidence-based policy making. Currently, Migration Policy Group (MPG) and UNHCR are developing a step-by-step practical tool and communication materials for refugee integration stakeholders to design and evaluate their practices for the integration of beneficiaries of international protection.<sup>29</sup> UNHCR will further support local level integration actors in Finland by facilitating partnerships between Council of Europe’s ICC Programme and Finnish local authorities as well as piloting MPG-UNHCR’s practitioners’ tool for refugee integration among Finnish local authorities and other integration stakeholders.

Finally, UNHCR welcomes the comprehensive review of the integration system initiated by the Ministry of Economic Affairs and Employment, which aims to build synergies with national programmes, including the social security reform, the Changing child and family services programme, lifelong learning and education reforms, National democracy program, National security report, Anti-racism and anti-discrimination programme, Anti-trafficking plan, activities to prevent the exploitation of foreign labour, language policy agenda and

<sup>25</sup> Start-up refugees in Finland (available at: <https://startuprefugees.com/>); Sisters in Business in Norway (available at <https://www.sistersinbusiness.no/butikk/sider/om-oss>); Yalla Trappan in Sweden (available at <https://www.yallatrappan.com/>); Womenisa network in Sweden (available at <https://www.womenisa.se>); Techfugees in Denmark (available at <https://techfugees.com/basefugees/>) and many more.

<sup>26</sup> IOM, UNCTAD, UNHCR (2018). Policy Guide on Entrepreneurship for Migrants and Refugees. Available at: <https://www.unhcr.org/publications/operations/5bd31fd67/policy-guide-entrepreneurship-migrants-refugees.html>

<sup>27</sup> The National Advisory Board for Ethnic Relations (ETNO) and its regional settings, available at: <https://oikeusministerio.fi/en/the-advisory-board-for-ethnic-relations>

<sup>28</sup> Council of Europe, The Intercultural Cities Programme (ICC), available at: <https://www.coe.int/en/web/interculturalcities>

<sup>29</sup> Practitioners’ tool for refugee integration in Europe, available at: <https://www.migpolgroup.com/index.php/portfolio-item/integrationtoolunhcr/>

Entrepreneurship strategy. In the context of such holistic approach UNHCR recommends to pay particular attention to the facilitation of synergies and cooperation at the local level, where refugees, immigrants and native born population would be able to benefit from mainstream services (such as labour market, health care, social support, anti-discrimination and education) and specific or targeted measures (such as antitrafficking and prevention of exploitation).

### *2.6 Cohesive society and good population relations*

UNHCR welcomes the Report's focus on building cohesive society, foster good population relations and the sense of belonging by suggesting to explore possibilities to develop and apply community sponsorship programme(s) for refugees. UNHCR will further support and facilitate partnerships and networks to capacitate stakeholders with relevant knowledge and tools to develop a community sponsorship programme in Finland. Additionally, UNHCR recommends to develop guidelines for civil society organizations and grassroots movements on their (potential) role in the new integration framework. UNHCR experience shows that in the context of strong involvement of municipalities and clear integration mandate of local authorities, the role and contribution of civil society should be clarified and sustainable funding foreseen. Activation of civil society should be facilitated in a synergy with bigger engagement of local authorities and regional coordination.

There is a risk that the asylum space will shrink in Europe and beyond, if integration is seen as not successful, which could influence public perceptions and policies negatively. As part of good population relations (Chapter 13), UNHCR recommends to develop proactive communication activities and action plans to showcase good integration examples, Finland's achievements in developing a comprehensive integration system and reaching positive integration outcomes. UNHCR is ready to support Finish partners to adjust and promote a realist and positive narrative reflecting the contributions refugees and immigrants make to economy and society.

### *2.7 Monitoring and evaluation*

The Report emphasizes that compared to the native born population, immigrants are still having poorer indicators in many integration areas, including housing, health and education. Additionally, refugees are indicated as a group which has even more challenges in comparison to overall immigrant population in Finland. Therefore, UNHCR recommends to develop a comprehensive monitoring system which would allow to evaluate integration services specifically targeting refugees and focusing on integration outcomes, quality of services and individual/collective refugee experiences in using various integration services. Additionally, UNHCR is encouraging to further develop data-driven approach to the systematic collection and analysis of data disaggregated by legal status, especially in the fields of employment, housing, social protection, education and health, including through population and housing censuses, labour force, education and health surveys. Such monitoring would create a strong background to further develop evidence-based integration action planning in Finland for various groups of refugees.

UNHCR appreciates the constructive dialogue and cooperation with the Finnish Government, and we thank you for your considerations of this important matter.

We remain at your disposal for any clarification required

Yours sincerely,



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Deputy Representative