

Lausunto

10.02.2026

Asia: VN/33963/2024

## **Lausuntopyyntö hallituksen esityksestä kotoutumisen edistämisestä annetun lain muuttamisesta ja siihen liittyviksi laeiksi**

### **Lausunnonantajan lausunto**

#### **Kotoutumista ja kielitaitoa edistävien koulutusten uudistaminen**

#### **Kotoutumisen edistämisen rahoituksen säätöt**

#### **Kotoutumisen tavoitteet ja velvoittavuuden lisääminen**

#### **Alkuvaiheen palveluprosessin muutokset**

#### **Muut huomiot**

RE: Government Proposal to Parliament for amending the Act on the Promotion of Integration and related laws (TEM099:00/2024)

Dear Madam,

I am writing to you about the Government Proposal to Parliament for amending the Act on the Promotion of Integration and related laws (Hallituksen esitys eduskunnalle kotoutumisen edistämisestä annetun lain muuttamisesta ja siihen liittyviksi laeiksi), which has been circulated for comments. Pursuant to its mandate, UNHCR wishes to offer its observations on the Proposal.

The rationale behind the Proposal is to reform the Act on the Promotion of Integration in accordance with the Government Programme by shifting integration toward a more “obligation-based” model with a particular focus on employment and language learning. The Proposal also seeks to streamline and consolidate integration services and funding structures, while achieving savings in public expenditure.

UNHCR commends Finland for its long-standing commitment to supporting the integration of refugees, and acknowledges the sustained efforts undertaken to ensure their inclusion in Finnish society. Furthermore, UNHCR would like to take this opportunity to recall that Finland’s well-established refugee integration practices—and its consistent efforts to equip municipalities with the resources required to implement them—remain among the most widely recognized in Europe. Alongside its Nordic neighbours, Finland has for many years served as a benchmark for effective integration systems, frequently cited as a source of guidance for other countries. This has been especially evident in recent years in the context of the Ukraine situation, as a growing number of states and municipalities in Central and Eastern Europe have emerged as major refugee hosting destinations. These actors have drawn on Finland’s tried and tested effective approaches to integration governance, social cohesion and inclusion as they work to build and strengthen their own systems, societies and economies.

The 1951 Convention relating to the Status of Refugees and its 1967 Protocol place considerable emphasis on the integration of refugees. The 1951 Convention enumerates social and economic rights designed to assist integration, and in its Article 34 calls on States to facilitate the “assimilation and naturalization” of refugees. UNHCR’s Executive Committee has further recognized that the process of local integration is complex and gradual, comprising legal, economic and socio-cultural dimensions, all of which are essential for refugees’ successful inclusion as full members of society.

UNHCR recalls that integration is a two-way process between refugees and their host communities. Integration is a legal, socio-economic process and a social and cultural process of acclimatization by the refugees and accommodation by the local communities. It also requires refugees to participate in integration programmes, and comply with the laws of their host State, including respecting core standards of human rights.

UNHCR notes with concern that the reform may result in reduced funding for municipalities and other actors engaged in integration activities. Insufficient funding may adversely affect both the availability and the quality of services and risk exacerbating disparities between municipalities in that regard. Differences in municipal capacity may in turn lead to uneven integration outcomes across Finland. UNHCR highlights that early investment in refugee integration is in everyone's interest and is essential for enabling refugees to achieve timely self-reliance.

Based on experiences across other Member States, UNHCR notes that the removal of specific compensation on reception is likely to reduce municipalities' willingness to receive resettled

refugees, especially smaller municipalities for which the financial impact is proportionally larger. UNHCR recommends that Finland mitigate disproportionate fiscal burden on municipalities and preserve a geographically diverse capacity for municipalities to receive resettled refugees.

While general integration policies should address persons in need of international protection along with other categories of migrants, UNHCR notes that refugees may have special needs and face particular challenges with regard to integration due to past experiences of persecution, flight, exile and loss of documentation. UNHCR is concerned about the potential impact of the reform on refugees' equitable access to targeted and specialist services that address their specific needs and complement mainstream support structures. UNHCR recommends that Finland ensure the availability of adequately funded, targeted and specialist services that address refugees' specific needs, irrespective of their geographic location or municipality of residence.

Furthermore, UNHCR wishes to emphasize that integration policies can only be effective if built on partnerships. These should be underpinned by systems and structures that allow for coordination and ongoing dialogue between all key stakeholders involved in the reception of asylum-seekers and the integration of refugees as well as in the provision of mainstream social and community services. Against this background, UNHCR recommends that Finland maintain and further develop platforms for whole-of-society collaboration which bring together all key actors including State institutions, local community and civil society stakeholders as well as refugees and their communities.

UNHCR remains ready to support states to reform integration efforts, so they more effectively support refugee labor inclusion to align with host country labour market needs. We also warmly welcome collaboration aimed at achieving more centralized and efficient matching of labour supply and demand—particularly where such measures expand opportunities for refugees and facilitate skilled employment. This direction is fully consistent with UNHCR's Refugee Employment Platform Initiative, in which Finland is a priority country, and where – together with Startup Refugees - we are already seeing promising levels of engagement from the private sector in advancing this shared objective.

I wish to thank you for your consideration of this important matter. I look forward to continuing our close and constructive dialogue and collaboration to support forcibly displaced and stateless people.

Yours sincerely,

Annika Sandlund

UNHCR, Representative

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UNHCR Representation for Northern Europe