



**Convention on the Elimination
of All Forms of Discrimination
against Women**

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against Women**

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**Consideration of reports submitted by States parties under
article 18 of the Convention on the Elimination of All Forms of
Discrimination against Women**

**Replies of Finland to the list of issues and questions in
relation to its eighth periodic report^{*,**}**

[Date received: 3 December 2021]

* The present document is being issued without formal editing.

** The annexes to the present document may be accessed from the web page of the Committee.



I. Replies to the list of issues and questions (CEDAW/C/FIN/Q/8)

A. Reply to paragraph 1 of the list of issues and questions

1. In the Gender Equality Index, published by the European Institute for Gender Equality (EIGE) in October, Finland scored 75.3/100, showing an increase of 0.6 points from last year and 2.2 points since 2010. Finland belongs to a group of countries where the national score is higher than the EU average, but the score has risen at a slower pace than the EU average. The most significant increase has been in the domain of power. The sub-domains of political and economic decision-making both showed an increase, where the biggest short-term increase was measured in political decision-making and the biggest long-term increase in economic decision-making.

2. The Government Action Plan for Gender Equality 2020–2023 (55 measures) has been implemented in the context of the COVID-19 pandemic by several ministries. Implementation is ensured and monitored by a working group of representatives from the ministries. A group of state secretaries also monitors the implementation. An interactive event discussing the progress towards the Government's gender equality objectives has been organised annually with CSOs and stakeholders.

3. The Action Plan is based on international agreements and the Government Programme. It includes projects/programmes proposed by ministries, such as the extensive gender impact assessment of the Energy and Climate Strategy update, commissioned by the Ministry of Economic Affairs and Employment.

4. The third National Action Plan on Fundamental and Human Rights (2020–2023) strengthens the monitoring of fundamental and human rights and supports knowledge-based policymaking and fundamental and human rights impact assessment. Fundamental and human rights indicators were developed and chosen taking into account the need for disaggregated data. The plan identifies several relevant indicators for gender equality *e.g.* information on domestic and intimate partner violence, experience of inclusion among adults, children and youth, discrimination in employment, and information on equality in education.

5. A working group was set up in November 2020 to support the preparation of the government report on gender equality. It will be submitted to Parliament and is being prepared in accordance with the Government's Action Plan for Gender Equality. The report will, for the first time, set national objectives for gender equality. A monitoring system covering all branches of Government will be developed.

6. A service provider is actively sought to be chosen as the service provider to operate in the Sámi homeland. However, no applications have been submitted.

7. In 2020, out of the population of 5,533,793 in Finland 2,799,985 were women. Of these, 2,673,727 were of Finnish nationality (first). 15% were 0–14 years, 59.9% were 15–64 years and 25.1% were over 64. It is projected that the same numbers in 2070 are 10.7%, 53.7% and 35.6%. More population statistics are attached.

8. The Åland Islands have adopted a gender equality agenda for 2019–2030 consisting of six sub-targets: an equal division of power and influence between women and men, economic gender equality, gender-equitable education, an even division of unpaid housework and care work, gender equal health, and ending men's violence against women. The provincial act of Åland on shelters (2015:117) contains provisions on the services that a shelter must provide and on the qualifications required of its staff. The responsibility for the financing of the shelter activities lies with the province instead of the municipalities. Thus, all inhabitants, irrespective of municipality of residence, have equal access to the shelters. The programme of the Government of Åland for promoting integration in 2020–2023 emphasizes the

importance of applying the gender perspective and gender equality in all integration work.

B. Reply to paragraph 2 of the list of issues and questions

9. The prosecution service has special prosecutors prosecuting crimes against women and children. Other prosecutors are also specialized with such crimes. The tasks of the special prosecution team include providing training, advice, and guidance to other prosecutors on pre-trial investigations, consideration of charges, and pursuing charges. The National Prosecution Authority organizes regular training on crimes against women and children and trafficking in human beings (THB).

10. Intimate partner violence and violence against women are addressed in the degree education provided by the Police University College and in continuing education. In March 2020, the National Police Board imposed an obligation on police departments and the National Bureau of Investigation to provide comprehensive on-the-job training over the course of the year on the guidance provided to victims of crime, on mediation in criminal cases, and on restraining orders.

11. The Police University College is preparing a mandatory training module on intimate partner violence and violence against women for 2021–2022. In 2022, the police will participate in a training programme on violence against women for actors involved in criminal proceedings.

12. In 2021, the National Police Board has been running the MARAK project for the police, developing police skills in identifying and addressing intimate partner violence and violence against women, carrying out multi-professional co-operation and preventing new offences.

13. Gender equality and non-discrimination has been promoted in teacher in-service training financed by the Finnish National Agency for Education (EDUFI). The National Teacher Education Forum (TEF) has created e.g. the Teacher Education Development Programme that outlines the objectives and measures that ensure that teacher education will support equity and remain strong and attractive also in the future.

14. The gender equality and non-discrimination lessons during the basic training term of conscript training and during the non-commissioned officer training include lessons on e.g. the rules according to which equality is respected and unequal treatment is not accepted. Conscripts receive information on how to report inappropriate treatment to senior superiors or support staff. Defence Forces has also developed “*The Human Relations Skills*” training for conscripts conducted during the first quarter of the service to reduce violence against women. Annually around 21 000 young men and 1000 young woman participate in this education as part of their conscript service.

15. The webpage of the Ministry for Foreign Affairs provides guidance in Finnish, Swedish and English on submitting individual communications to the UN Treaty Bodies, including the guidance note and submission form. Information thereof has also been disseminated widely.

C. Reply to paragraph 3 of the list of issues and questions

16. During the COVID-19 pandemic, the Government’s declaration, jointly with the President of the Republic, of emergency conditions referred to in the Emergency Powers Act (1552/2011), which entitled the Government to exercise powers under the

Act, made it possible *e.g.* to abolish, under certain conditions, the time-limits for access to non-urgent health care defined in the Health Care Act (1326/2010). The Act also makes it possible to waive the time-limit for initiating an assessment of the need for services referred to in the Social Welfare Act (1301/2014).¹

17. The use of powers under the Emergency Powers Act affected the availability of services equally for the whole population. However, the Ministry of Social Affairs and Health specifically emphasized in its instructions of March 2020 that the obligation to organize social welfare and health care services would continue despite the use of powers under the Act and that everyone's individual need for services must be assessed separately not to jeopardise anyone's right to last resort subsistence and care.

18. State-funded and government-run services for victims of domestic violence have remained operational throughout the pandemic, providing round-the-clock services to victims. The Ministry of Social Affairs and Health and the Finnish Institute for Health and Welfare (THL) have provided detailed guidance to shelters and the Nollalinja-helpline.

19. In 2020, the employment rate of women and the number of women in employment were more affected by the pandemic than those of men. Employment of women decreased for both wage earners and self-employed people, whilst among men mainly wage earners were affected. Women's employment declined, especially in sectors with a high proportion of part-time work and high numbers of young people. Men's employment decreased most in the sector where full-time work is the norm. The highest decreases in employment were recorded among women and men under the age of 25. While women's employment picked up in 2020, for men the increase in employment has been less pronounced. Employment growth for both genders has taken place mainly through part-time work, including part-time self-employment.

20. Only 16% of wage earners felt that their jobs had not been affected by the pandemic. Women were more affected than men, and the effects were felt more among remote workers than those working on site. About 50% of the workforce worked remotely. Opportunities to work remotely were lacking in many sectors dominated by women. Wellbeing at work has deteriorated somewhat more for women than for men. The most negative effects have been experienced by women working on site. In the health and social care sectors the risk of illness and overtime have increased the burden of work. For remote workers, the effects of the pandemic were more diverse, as they also experienced more positive effects than those who worked on site. Parents working remotely found it more difficult to combine employment and childcare in the spring of 2020, when daycare and schools were closed. This was more common among mothers than fathers. By the end of the year the situation improved.

21. In 2020, the Government launched a fast-tracked research project on the impact of the pandemic on gender equality *e.g.* in relation to the labour market, the economy, wellbeing and health.

22. Access to education has not been limited during the pandemic. EDUFI have provided large and frequently updated support packages to schools and education providers. Several higher education institutions and research institutes are carrying out studies on the societal impacts of the epidemic and on ways to minimise the harm. The studies suggest that the learning gap and the number of lonely students experiencing anxiety have increased during the pandemic.

23. In upper secondary school education, state aid supports education providers in financing additional resource needs related to education, guidance and support

¹ <https://um.fi/how-to-submit-a-complaint-to-a-un-committee>.

measures caused by the pandemic. In vocational education, additional funding has been allocated, in particular, to guidance and support the study of students who have dropped out of their training or are at risk of being interrupted and to guidance for students in the process of graduation and to enable demonstrations.

24. The pandemic has not been reflected in police statistics on domestic violence to any significant degree, and according to the National Crime Victim Survey 2021, violence not brought to the attention of the authorities had not increased significantly and the prevalence of intimate partner violence experienced by women was two percentage points lower in 2020 than in 2019.

25. In spring 2021, police units were urged to pay attention to the special characteristics of the pandemic and to appropriate intervention in cases of intimate partner violence and violence against women. Police units are asked to report to the National Police Board on their development measures at the end of 2021.

D. Reply to paragraph 4 of the list of issues and questions

26. In 2020, the Ministry of Social Affairs and Health published a wide report on gender equality planning and pay surveys as referred to in the Act on Equality between Women and Men (609/1986; Equality Act) in the private sector and the public sector. The results show that the majority of organisations draw up an equality plan and pay surveys, but there are considerable variation in their scope and quality. The main problems concern the frequency and quality of pay surveys. Areas needing further development relate to cooperation with the staff, processing on pay data, pay comparisons, and concrete measures in the plans. Development needs also included observing the set deadlines of the Equality Act.

27. A report assessing the effectiveness of the new Non-discrimination Act (1325/2014) was published last year. According to the report, several objectives of the Act have been achieved and different grounds for discrimination are acknowledged better. The Act has improved the visibility of equality issues and the detection of discrimination cases. Some discrimination still remains hidden. There are also problems in the enforcement of the Act *e.g.* relating to the resources of supervising authorities. Claims for compensation for discrimination are rarely brought before courts for the reasons such as cost risk, duration of the process, and uncertainty about the outcome. The cases brought before courts mostly concern discrimination in employment.

28. Victims of discrimination can claim for compensation in district courts. Under the Non-Discrimination Act, compensation must be claimed within two years from the alleged discriminatory acts. However, in cases concerning employment, the claim must be made within a year from when the applicant received notice of the selection decision.

29. In accordance with the Government Programme, a partial reform of the Non-Discrimination Act is under way. A working group has been appointed to examine and assess possible needs for amendments and to update the legislation. The issues to be assessed include *e.g.* the competence and tasks of the supervisory authorities, definition of harassment, and obligation to address harassment. The aim is to submit the reform to Parliament in 2022.

30. No cases of multiple forms of discrimination against women have been brought before the Non-Discrimination and Equality Tribunal. One case concerning granting credit where the victim was a man has been brought. Statistics on contacts to the Ombudsman for Equality are attached.

31. The private life of an individual is protected under the Constitution of Finland and international human rights treaties and the limitation in the scope of application of the Non-Discrimination Act refers to this. However, the Act is applicable when an individual's activity takes place outside private and family life, such as when an individual offers goods or services to the public. Additionally, section 6 of the Constitution of Finland contains a provision on equality and the prohibition of discrimination. Its scope of application is not limited as that of the Non-Discrimination Act.

32. In 2020, the Office of the Åland Ombudsman commissioned a report from the Statistics and Research Åland concerning discrimination experienced in the Ålandic society. The most common reason for discrimination was belonging to a certain gender (33%). In 2019, the Office of the Åland Ombudsman conducted a study on equality planning in the province. Of all entities obliged to prepare an equality plan, 55% had prepared an acceptable plan. Entities that have not yet prepared a plan are being monitored, informed and supported. The non-discrimination legislation of the province is being updated.

E. Reply to paragraph 5 of the list of issues and questions

33. According to section 9 of the Non-Discrimination Act, proportionate different treatment that aims to promote *de facto* equality, or to prevent or remove the disadvantages attributable to discrimination does not constitute discrimination. This provision allows *e.g.* such special measures that aim at achieving *de facto* equality of a certain vulnerable group.

F. Reply to paragraph 6 of the list of issues and questions

34. The National Non-Discrimination and Equality Tribunal does not have the mandate to impose compensation. Compensation must be claimed in court.

35. Occupational safety and health officials supervise the Non-Discrimination Act in cases concerning employment, while the Non-Discrimination Ombudsman supervises it in other situations. In the study concerning the effectiveness of the new Non-Discrimination Act, conflicting arguments were presented on the functionality of the solution. Some consider the mandates functional, others thought that the Non-Discrimination Ombudsman should be able to supervise the Non-Discrimination Act also in employment cases. Some noted that multiple forms of discrimination are not always identified due to the different mandates, and a discrimination case may be approached only from the perspective of one ground. The Non-Discrimination Ombudsman has noted that she could perform her tasks better if she could supervise the Act also in employment cases. The report noted that it is not always clear which is the competent authority.

G. Reply to paragraph 7 of the list of issues and questions

36. In the Government Action Plan for Gender Equality 2021–23, the measures for gender mainstreaming contribute to the gender equality goals set in the Government programme. Focus areas are the development of gender sensitive budgeting, gender impact assessment and performance management and the cooperation of and within the ministries. The gender equality competencies are enhanced via e-learning tool (published in March 2020). The production and use of gender-analysed data is enhanced in the decision-making processes. An extensive study on the gender-specific social, financial and health impacts of the pandemic in the short and the long term is

conducted. The ministries will integrate gender equality in at least one of their main programs.

37. The results of the measures in the action plan will be reported in early 2023. The monitoring in autumn 2021 shows both good and worrying developments. The e-learning tool is enhancing the gender equality competencies of the civil servants across the state administration, the gender equality and non-discrimination actions plans in the ministries are developing, the gender impact assessment of the energy and climate change strategy succeeded very well and the gender perspectives in the state budget 2022 were more thoroughly developed than before.

38. Due to the pandemic, the resources for the enhancement of gender equality were decreased in the administration. This might be one reason for the low number of the gender impact assessments in 2020 (15% of all the government proposals given to Parliament in 2020 had some kind of gender perspective or impact assessment). There will be special training on the assessments for the civil servants working with the policy measures and government proposals during 2021–22. The Centre for Gender Equality Information and Statistics Finland produce and disseminate gender disaggregated data and information.

39. Each ministry has adopted gender equality and non-discrimination plans. Some have been adopted separately, but almost all have plans that combine both. Several have published updated versions, others are in the process of updating theirs. Most of the plans focus on promoting operational gender equality and non-discrimination in addition to personnel policy. 60% of ministries also report supporting, or being in the process of starting to support, the promotion of non-discrimination in the agencies of their administrative branch. 80% of ministries have linked monitoring to their administrative branch's performance guidance or other similar processes.

40. Most municipalities (79%) have adopted personnel non-discrimination plans. 36% have adopted operational non-discrimination plans, further 17% are planning one.

41. The Government of Åland intends to urge the municipalities and joint municipal authorities to implement the European Declaration on Equality between Women and Men, in order to realise gender equality in local government.

H. Reply to paragraph 8 of the list of issues and questions

42. See Question 1.

43. Gender equality mainstreaming is included as a strategy in the gender equality agenda of the Åland Islands. A gender equality action plan is prepared annually and financed. Statistics are used to support the mainstreaming. All Ålandic statistics on individuals are broken down by gender.

44. Training on the theme of domestic violence is organised at regular intervals, in dialogue with public authorities, based on their needs.

I. Reply to paragraph 9 of the list of issues and questions

45. In 2019, in managerial positions 36.9% were women (34% in 2014).

46. In June 2021, the proportion of women on the boards of publicly listed companies was on average 29% (in 2020 30%). The boards of large cap publicly listed companies had 32% women (34% in 2020, 34 % in 2018), the mid cap companies 31% (30% in 2020, 28.5% in 2018) and the small cap companies 24% (26% in 2020,

24.1% in 2018). Among the chairs of the boards of publicly listed companies, 9% were women (7% in 2020, 4% in 2018).

47. With regard to executive positions, women represent 8% of the CEOs in the publicly listed companies in 2020 (8% in 2018). The executive teams in the publicly listed companies had 27% women in 2020, the highest number in history.

48. In 2018, 11% of the chairs of boards of the largest unlisted companies and 13% of the CEOs were women. Of the board members 35.4% (by size of personnel) and 21.8% (by market value) were women. The share of women in boards was higher in unlisted companies with the largest amount of staff.

49. In 2018, 41.2% of board members of state-owned companies were women. The share of women in boards was higher in companies with a larger governmental holding share. In fully state-owned companies, the share of women in boards was 46.2%.

50. In 2018, 15.6% of CEOs were women in state-owned companies.

51. According to the Government Action Plan on Gender Equality 2020–23, the goal is that both genders have a representation of at least 40% on the Boards of Directors of large and medium-sized publicly listed companies. This should be principally achieved in keeping with the recommendations in the Corporate Governance Code of the Securities Market Association and through the companies own actions. The Government will monitor progress towards this goal and evaluate its effectiveness on an annual basis. Concerning the State-owned companies, Government has continued its efforts to increase the percentage of women among members of Boards of Directors and management groups in State-owned companies, based on the original goals set in 2004. Progress towards these goals and the gender equality goals defined in the Government Resolution on State-ownership Policy will be monitored on an annual basis in the Government's reports to Parliament.

52. With regard to the companies with municipal majority, the Equality Act stipulates that "if a body, agency or institution exercising public authority, or a company in which the Government or a municipality is the majority shareholder has an administrative board, board of directors or some other executive or administrative body consisting of elected representatives, this must comprise an equitable proportion of both women and men, unless there are special reasons to the contrary." Authorities and all parties that are requested to nominate candidates for these bodies must, wherever possible, propose both a woman and a man for every membership position. The equitable proportion can be set aside only for a special reason. All special reasons must be justified.

53. *Our elections*-campaign supported by the Ministry of Justice and the Advisory Board for Ethnic Relations aims to make migrant voices heard in politics. As part of the campaign, events are organised with CSO's who work closely with migrant women and girls prior the municipal elections of spring 2021 and the forthcoming county elections in January 2022. The Ministry of Justice handed out the Democracy Award of 2020 to three civil society actors, one a project by Plan International Finland supporting civic activity of migrant girls. A central aim of the Government's current cross-administrative National Democracy Programme 2025 is to make sure that no one is left behind as regards to participation, which also supports the implementation of sustainable development.

54. A working group of the Ministry of Education and Culture has examined the state of early childhood education and education in Sámi as a whole. It has prepared proposals for developing early childhood education in Sámi, the Sámi languages and teaching in Sámi, securing the availability of Sámi-speaking personnel and teaching material in the fields of education, social and health, and strengthening the knowledge

of Sámi languages, Sámi history and culture and Nordic school cooperation in Sámi education.

55. The main objective of Finland's National Policy on Roma 2018–2022 is to support positive social integration of the Roma and positive development of linguistic, cultural and social rights. In general, Roma women have higher educational attainment than men, and girls outperform boys.

56. Government Report on the need for a reform in integration promotion services was given to Parliament in June 2021. It includes proposals on improving access to integration services for those migrants who are outside the labour force. The report presents measures that aim to accelerate paths to work and education, promote inclusion in working life in society, support in particular immigrant women, including their families, in settling in Finland, and increase receptiveness in the workplace and prevent polarisation in society. The main integration challenges are reflected in the inclusion of women and the employment rate of immigrants. The report proposes an integration programme. A framework would be created for promoting integration of immigrants outside the labour force to improve the integration opportunities of immigrant women, especially of stay-at-home mothers.

57. Since 2018, literacy education for immigrants has been given in the liberal adult education institutions. Studies, which are included in person's integration plan, are eligible for 100 % state finance and are free of charge for the students. One of the objectives is to increase educational opportunities for those who are outside the labour force, including the immigrant women who are taking care of the children at home.

58. Municipal skills centers offering rehabilitation, education, skills recognition and employment services for immigrants have been established in seven municipalities. One of the target groups are immigrant parents seeking ways to return to the labour force after long parental leaves.

59. Family leave to Working life-project is currently implemented nationwide offering coaching services to parents who find it difficult to return to the labour force or to find employment. Immigrant women are one of the target groups.

J. Reply to paragraph 10 of the list of issues and questions

60. The current Government Programme commits to work against hate speech, especially online. The Government will take horizontal measures to more effectively address systematic harassment, threats and targeting that pose a threat to the freedom of expression, official activities, research, and media freedom. The Government will ensure sufficient resources and competence for the prevention and detection of such offences. Systematic monitoring in relation to discrimination and hate crime will be promoted.

61. An amendment of the Criminal Code concerning the right to bring charges for menace came into force in October 2021. The public prosecutors now have the right to bring charges based on the target's duties in employment or public commission of trust.

62. The government proposal concerning an amendment to the Criminal Code to add gender among the motives that constitute grounds for increasing the punishment of (any) offence is under consideration in Parliament.

63. The proposals of a report by a Government appointed rapporteur to evaluate the provisions of the Criminal Code and other relevant legislation to combat the problem of hate campaigns (so called targeting or online shaming) are being evaluated.

64. In February 2019, the Ministry of Justice launched a campaign on recognizing punishable hate speech. The campaign featured two videos that also aired on national television (1.6 million viewers): <https://yhdenvertaisuus.fi/en/hate-speech>.

65. In April 2021, the Ministry of Justice published a report on the utilisation of artificial intelligence in monitoring hate speech: <https://julkaisut.valtioneuvosto.fi/handle/10024/163382>

66. Finland continued to take part in the Global Media Monitoring project surveying gender roles in the media. A report published 2020 shows that progress is slow. Of all news subjects in the monitored and coded news stories 33% were coded as women and the number has risen only by 13% since the first round in 1995.

K. Reply to paragraph 11 of the list of issues and questions

67. A memorandum on the punishability of forcing a person to enter into marriage prepared by the Ministry of Justice has been circulated for comments in November 2021.

68. A working group established to propose clarification of the Criminal Code as regards to female genital mutilation aims to publish its proposals at the end of February 2022. A related legislative proposal is scheduled to be submitted to Parliament during fall 2022.

69. Ministry of Economic Affairs and Employment has given THL resources to establish a national center of expertise on honour-related violence from the beginning of 2021 to strengthen the competence in honour-related violence and to work with stakeholders and organizations to combat violence. The Ministry organised in 2017–2018 training sessions on FGM and honour related violence to professionals working in the field of integration in cooperation with the Finnish League for Human Rights. The Ministry has also financed two projects carried out by the Family Federation of Finland concerning material on sexual rights and concerning sexual health competence in integration and promotion of equality and gender equality.

70. Questions about FGM have been included into 5 cross-sectional population-based large scale studies in Finland between 2010 and 2019 by THL. In addition, the Medical Birth Register monitors FGM and de-infibulation by collecting data filled in by healthcare professionals and the Care Register for Health Care collects data on the activities of health centers, hospitals, and other institutions providing inpatient care.

71. No asylum seeker reported that their daughters, aged 0–12 years, had undergone FGM and only a few teenagers reported having undergone FGM. The 18–29-year-old parturients (women having recently given birth) had most commonly undergone FGM and two thirds of the women with FGM were under thirty years old. The average age at which female asylum seekers had undergone FGM was five years. The majority underwent FGM between 0 to 1 years, whereas some reported having undergone FGM at school age or later. Among the foreign-born population, the average of having FGM performed was 7.0 years (CI 5.6–8.5) which was also the most common age for FGM.

72. Of the upper secondary school and vocational school foreign born female students, FGM was most common among adolescents born in Somalia (20%). Women of Somali origin also had the highest prevalence of FGM among women who had given birth (58%). Additionally, women from Afghanistan, Myanmar, the Dominican Republic, Ethiopia, Eritrea, Iran, Iraq, Morocco, Nigeria, Sudan, Turkey and Egypt were reported to have undergone FGM. In 2017–2019 63 women were registered to have deinfibulation in the Finnish health care registers: 42 in the Medical Birth Register and additionally 21 in the Care Register for Health Care.

73. About half of the FGM mothers had a foreign background and they were born abroad and about half lacked information about their origin because they had migrated to Finland after 2014, which information is not collected. 38% of FGM mothers whose country of birth was known, were born in Somalia. Little less than 3% of FGM mothers were born in the Middle East. None of the FGM mothers were born in Finland. In 2019 there were 164 FGM mothers giving birth and 15 deinfibulations during birth registered.

74. The action plan for combating violence against women covers also honour-related violence. The ten measures covering issues relating to honour-related violence include *e.g.* training of criminal justice, health and social service professionals as well as drawing up and updating official instructions *e.g.* for student welfare services.

75. Honour-related violence against children as well as FGM are well covered in the Non-Violent Childhoods: Action Plan for the Prevention of Violence against Children 2020–2025.²

76. In 2013–2019, there were no women aged 20–24 married or in a union before the age of 15 and less than 1% before the age of 18.

77. Constructing products that can consist of an artificial membrane that releases blood-like product when dissolving upon oneself is not prohibited in Finland, nor is the manufacturing, selling or marketing of such products. Sometimes hymenorrhaphy can also be meant when referring to constructing an artificial hymen, although the operation is often referred to as hymen reconstruction. These operations are generally considered to be one form of female genital cosmetic surgery and cannot be seen to cause permanent damage to the female genitalia. As such, it is not prohibited. Also other types of female genital cosmetic surgeries are not prohibited if they are performed with the full consent of the subject.

L. Reply to paragraph 12 of the list of issues and questions

78. In 2020, there were approximately 16,560 women victims of violence out of which 15,106 were Finnish. Further statistics are attached.

79. The evaluation of the Action Plan for the implementation of the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) 2018–2021 is currently under way.

80. The action plan for combating violence against women was published in October 2020. Of its 32 measures 21 are scheduled to be launched or fully implemented in 2021. The implementation is proceeding as planned.

81. Parliament approved the legislative proposal concerning the establishment of the post of a rapporteur on violence against women in October 2021. The relevant Act will enter into force at the beginning of 2022. The Non-Discrimination Ombudsman is appointed as the rapporteur and will monitor violence against women and domestic violence, functionality of national legislation, and implementation of international obligations and monitor and assess measures and policies to prevent and combat violence against women and domestic violence in accordance with the Istanbul Convention. The rapporteur observes all forms of violence and also intersecting issues, such as violence against women belonging to minorities or with disabilities.

² https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162554/STM_2020_34_J.pdf?sequence=1&isAllowed=y.

82. Of 1,630 persons protected by restraining orders in 2020, 1,144 were women (in 2014, of 2,839 protected persons 1,898 were women), and 1,479 of the persons were Finnish.

83. Restraining orders do not always provide victims with adequate protection and are violated often. There has been a decrease in the number of restraining orders since applying became subject to a charge in 2016. The report of the working group established to assess the ways to improve the effectiveness of restraining orders, to reduce the incidence of violations of orders, and to improve the safety of victims of intimate partner violence was published in September 2021. It contains, *e.g.* proposals to introduce electronic monitoring of orders and to abolish the fee for applying for an order.

M. Reply to paragraph 13 of the list of issues and questions

84. The Government plans to submit the legislative proposal concerning the comprehensive reform of legislation governing sexual offences to Parliament in early 2022.

85. To enforce criminal liability, speed up the handling of offences and shorten processing times across the judicial process, the resources of the police, prosecutors and courts have and will be increased. In accordance with the Government Programme, the number of police officers will be increased to 7,500 person-years by 2022.

86. Research on intimate partner violence has been done in the administrative branch of the Ministry of the Interior for several years in connection with a monitoring study of homicides. The study, carried out since 2002, monitors acts that are investigated under categories of murder, voluntary manslaughter, voluntary manslaughter under mitigating circumstances, infanticide and assault resulting in death. The aim is to provide information for the prevention of homicides.

87. A project is carried out to gather data on women who have died as victims of intimate partner violence to identify the event chains and possible contacts with the authorities and organisations that preceded the killing and to provide information on whether the killing could have been prevented. In 2021, the Ministry of the Interior provided funding to the Police University College for launching a study on intimate partner killings.

88. THL has translated brochures on sexual and domestic violence into three Sámi languages. Also, a SERI-center is being prepared in Ivalo and is estimated to start operating next year.

89. On 1 April 2015, the Parliament of Åland accepted the entry into force the Act of the national Parliament on bringing into force the provisions of the Istanbul Convention, to the extent the Convention falls within the competence of the province. In 2020, Åland adopted a strategy on zero tolerance towards violence in intimate relationships (2020–2030). In 2021, a committee consisting of leaders of public authorities and representatives of the Government of Åland was set up to implement the Istanbul Convention and to monitor compliance with it.

N. Reply to paragraph 14 of the list of issues and questions

90. Statistics on THB reported to the police are attached.

91. The police cooperates internationally mainly through Europol and its Joint Investigation Teams. The police participate actively in Europe-wide operation actions

carried out through Europol's European Multidisciplinary Platform Against Criminal Threats/Trafficking in Human Beings (EMPACT/THB).

92. Following statistics show the number of victims (presumed and identified) referred to the National Assistance System for Victims of Human Trafficking (Assistance System). No statistics are collected on disability, minority group status or ethnicity. No statistics are available on nationality.

<i>Year</i>	<i>Adult Female</i>	<i>Female Children (girl)</i>	<i>Sexual Exploitation (women and girls)</i>
2014	38	less than 5	no data available
2015	36	0	18
2016	83	9	18
2017	67	6	33
2018	83	4	53
2019	139	7	68
2020	131	4	55
2021*	54	4	23

* 1.1.-30.6.2021.

O. Reply to paragraph 15 of the list of issues and questions

93. No amendments referred to in the List of Issues have been made to the Aliens Act (301/2004). The residence permit practice relating to victims of THB was investigated in a study carried out by the Non-Discrimination Ombudsman, which acts as the national rapporteur on THB. According to the National Action Plan against THB, the application of the provision of the Aliens Act on suspicion of selling sex as grounds for denial of admittance or stay will be reviewed and the need for legislative amendments and to develop practices assessed.

94. The latest amendments of the Criminal Code concerning THB offences came into force on 1 January 2015. The purpose of the amendments was to clarify the difference between THB offences and pimping and to make sure that the legislation is better in line with international obligations concerning THB. The amendments were to result in THB offences being investigated and prosecuted as THB offences rather than pimping. One of the changes was to remove "or pressures" from the pimping provision (section 9, chapter 20) and to add "or by pressuring another" to the THB provision (section 3, chapter 25). Furthermore, the references to grievous bodily harm, a serious illness or a state of mortal danger or comparable particularly grave suffering already included in the provision on aggravated THB (Section 3(a), chapter 25) were removed from the provision on aggravated pimping (section 9 (a), chapter 20). THB provision was clarified to cover also situations where the victim has not lost his or her liberty but is under the mental control of the offender.

95. The National Action Plan against THB was adopted in May 2021.³ The Action Plan is based on five strategic objectives: (1) Victims of THB are reached and identified, exploitation is detected by the authorities; (2) victims of THB receive the assistance and support they need; (3) criminal liability is established in THB offences; (4) THB is combated together and on a wide front; and (5) anti-trafficking action is developed on a data-driven basis) and 55 actions. Actions included in the plan are to

³ https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163326/OM_2021_24_ML.pdf?sequence=1&isAllowed=y.

be non-discriminatory and their implementation must promote gender equality and an approach that acknowledges gender diversity. The Plan aims to implement also the Committee's previous recommendations.

96. The post of Government Anti-Trafficking Coordinator was established in 2014. Originally in the Ministry of the Interior, the post was transferred to the Ministry of Justice in 2020. The new national anti-trafficking unit of the police was established by the National Police Board in February 2021. The Assistance System has been in operation since 2006. In addition, the National Prosecution Authority has established its own network of prosecutors specialized in THB cases.

97. The National Action Plan against THB includes actions that seek to enhance cooperation between different authorities and other relevant actors. It was prepared by an intersectional working group and the preparations were led by the Anti-Trafficking Coordinator. One of the main priorities in the preparation of the Action Plan was to put coordination on an established footing, to strengthen cooperation, and to mainstream anti-trafficking action.

98. The police work closely with the Anti-Trafficking Coordinator to implement the Action Plan. The Assistance System is in ongoing dialogue with the coordinator.

99. The police and the Assistance have a well-established co-operation and good operational co-operation relations between the System and the anti-trafficking unit. The police refers victims to the Assistance System in accordance with the National Police Board's guidelines. The Assistance System provides support to the police in removing victims of THB from a non-EU country from Finland.

100. The Ministry of Social Affairs and Health has set up a working group to reform the legislation concerning assistance of victims. A government proposal is expected to be submitted to Parliament at the end of 2022.

101. The Assistance System organizes training for public and private sector professionals, including police and other law enforcement officials, prosecutors, social workers, immigration officials, public authorities at regional and local level and prison and probation services, and to NGOs on THB and victim identification, also in cooperation with other professionals. In the National Plan against THB, trainings are also envisaged to private entities such as civil air travel staff. The trainings include information on THB for sexual exploitation and forced marriages.

102. The Finnish Immigration Service has in October 2020 updated a protocol on assessing cases of potential victims of THB. This protocol applies to the whole agency and includes measures to be followed in the process of identification. It takes into account the gender perspective in giving an overview of different types of THB and recognising that some of the types are gender based.

103. The different units of the Immigration Service provide more detailed and targeted training and guidelines for their officials, including training on gender sensitive topics, such as THB. Female interpreters and interviewers are used, unless there is a specific reason to use male interpreters and/or interviewers. Officials are also provided with different training modules by the European Asylum Support Office (EASO) on gender, THB, and vulnerable persons.

104. The reception system collaborate also with the Assistance System to train on gender sensitive topics related to THB.

105. The police have provided training on combatting THB for all departments in co-operation with the Assistance System. The topic has also been included in the initial and further training of the police. A separate training course on combatting THB is carried out in 2021–2022.

P. Reply to paragraph 16 of the list of issues and questions

106. The National Action Plan against THB contains actions, which aim to strengthen the work against THB for the purpose of sexual exploitation. A cooperation network between authorities and CSOs is to be constructed. Funding of EUR 140 000 is addressed to a CSO coordinated development project to strengthen the capacities in identifying THB related to gendered violence and sexual abuse, promoting its detection and referring victims to assistance.

107. An examination into why the provisions of the Criminal Code concerning abuse of a victim of sexual trade are only seldom applied will be carried out. The findings, including practical proposals that can improve authorities' actions and the enforcement of criminal liability are estimated to be published at the end of 2021.

108. According to the Government's Action Plan for Gender Equality (2020–2023), a survey on the current situation of prostitution in Finland will be conducted.

Q. Reply to paragraph 17 of the list of issues and questions

109. In November 2021, 91 of the 200 members of Parliament were women.

110. Majority of the candidates in the municipal elections have always been men. In the elections 2021, 21,480 of the candidates were men and 14,147 women, *i.e.* 39.7% per cent, which is 0.2 percentage points lower than in 2017.⁴

111. Finland has 8 women members of the European Parliament (EP) out of 14 members in total.

112. Regarding women in high-level positions in municipalities in 2021, 34.5% of the chairpersons of the council and 35.5% of the chairpersons of the board are women. In the councils 40.2% of the members were women.

113. In the Sámi Parliament, out of the 21 members and 4 deputy members, 8 members and 1 deputy are women. Out of the 7 members of the executive board, 3 members (one a vice chair) are women.

114. Women were granted the right to apply for military service and military careers in 1995. Female officers are promoted according to the same principles as male officers, and currently the highest military rank of female officer is a lieutenant colonel. Out of senior officers currently on permanent duty there are 453 male Lieutenant Colonels and 3 female and 968 male Majors and 21 female. In 2020, 2.8% of the officers and 2.2% of the special officers were women. In 2018, of the 4,734 commissioned officers 102 were women and of the 3,167 non-commissioned officers 202 were women. Of all the staff, 18.7% were women in 2020, and 1,100 women entered military service (voluntary) (22,846 men).

115. In 2019, 63% of the judges were women.

116. One third, *i.e.* 10 members of all 30 members of the Parliament of Åland are women. Before the parliamentary elections in 2019, the Government of Åland decided that a monetary gender equality bonus be given to those political parties which had gender equal candidate lists. However, the goal to achieve a more gender equal parliament was not attained. In 2022, a parliamentary committee will be set up to discuss measures to be taken to achieve a more gender equal parliament in the elections of 2023.

⁴ https://tilastokeskus.fi/til/kvaa/2021/01/kvaa_2021_01_2021-06-04_tie_001_en.html.

R. Reply to paragraph 18 of the list of issues and questions

117. Equality and non-discrimination plans are compulsory in all educational levels except early childhood education. The legislation to extend this to the early childhood education is supposed to be ready in the beginning of 2023.

118. The equality and non-discrimination plans have been evaluated in the primary and lower secondary education. The main outcome was that although the work is generally done in most of the schools about 40% of the plans do not meet all the criteria described in the Act.

119. The objective of reducing gender segregation in guidance counselling is included in the guidance counselling development programme.

120. EDUFI is in the curriculum support materials promoting women and girls to choose non-traditional fields of education and career paths. The curriculum promotes gender equality, special attention to this is paid in guidance and career counselling.

121. Early childhood education is gender sensitive, promotes equality and aims to break down stereotypes. Equality is emphasised in the value basis, educational goals and learning environments. Children are met as individuals, not representatives of their gender.

122. Government-funded LUMA Centre Finland, a science education network of universities closely related to all teacher education, includes activities to inspire girls to study science-, technology, engineering- and mathematics-related subjects (STEM). The upcoming national STEM strategy will include statements of gender equality and parity in opportunities for education.

123. The Government of Åland supports projects of the third sector dealing with gender norms and values in schools, in order to encourage boys and girls to make non-traditional educational choices.

S. Reply to paragraph 19 of the list of issues and questions

124. Under the legislation concerning schools, students have the right to a safe learning environment comprising of psychological, social and physical factors. The obligation to intervene in sexual harassment is statutory. Sexual harassment constitutes also discrimination prohibited under the Equality Act, and the Health Care Act lays down an obligation to conduct triennial checks on the health and safety of school environments and psychosocial welfare, covering also sexual harassment and the practices associated with it.

125. Notwithstanding secrecy provisions, education and social and health care service staff have the obligation to notify the police when they have reason to believe, due to facts that have become known to them while performing their duties, that a child has been exposed to an act punishable as a sex offence under the Criminal Code, or an act punishable as homicide or bodily injury under the Criminal Code, the maximum punishment for which is imprisonment for at least two years.

126. The Pupil and Student Welfare Act obliges educational institutions to prepare a plan for protecting students from violence, bullying and harassment. The psychologist's and social worker's services support the students' learning and welfare as well as their social and psychological capabilities. Pupil and student welfare promotes the students' health, physical and psychological growth and development, well-being and ability to study. Using student welfare services is always voluntary for a student.

127. The Ministry of Education and Culture is funding a project that aims to strengthen children's emotional and interaction skills and prevent bullying in early childhood education settings. The project continues until the end of year 2022.

128. The action plan to prevent bullying, violence and harassment in schools and educational institutions was published in 2021. Promoting equality and non-discrimination is an integral part of the Action Plan. According to the Plan, pedagogical competence related to promoting wellbeing and preventing loneliness and bullying will be defined as a priority area in the continuing professional education of staff and management over the next three years. Moreover, the harassment contact persons' activities within higher education institutions will be strengthened. In addition, the objective is to increase the competence of higher education communities in equality planning and its practical implementation.

129. In the new general senior secondary education core curriculum sex and gender questions are included in health education (sexuality, sexual health and sexual rights), philosophy (gender and power), psychology (gender and sexual identity, gender and sexual diversity), ethics (identity, gender and sexual diversity, intersectionality), history (gender roles) and biology.

130. One of the main themes in 2020–2023 in the continuing education and training is promotion of inclusion, wellbeing and safety and prevention of bullying in learning communities, sexual harassment being mentioned separately. Moreover, in order to improve teachers' capabilities related to the promotion of wellbeing and safety, higher education institutions are encouraged to increase these contents for teachers' basic education. TEF deals with measures related to wellbeing and the prevention of bullying in teacher education.

131. The Finnish National Agency for Education has published a guide on preventing and intervening in sexual harassments at schools and educational institutions.

132. The Defence Forces' national plan for gender equality and non-discrimination was drafted in 2007 and revised in 2017. According to the plan, principles of equality and non-discrimination should be followed in all planning, actions, and leadership. A working atmosphere that is respectful towards gender equality and non-discrimination must be paid attention to within each administrative unit.

133. The plan stipulates also, *e.g.* that unwarranted discrimination is not accepted in any form. People must have an equal and fair opportunity to participate in training, be promoted, receive equal remuneration, and be treated equally. The intentional or factual offending of a person or category of people is unacceptable.

134. Moreover, everyone must have access to the instructions on how to manage harassment and inappropriate behaviour. Brigade-level units and teaching establishments must ensure that everyone knows how to act when they witness disturbance, harassment, or bullying. The rights and obligations of each soldier regarding gender equality and non-discrimination were added to the General Regulations and the Soldier's Handbook.

135. As of 2021, the sexuality education based on the curriculum of comprehensive school in the Åland Islands contains an increased amount of discussion on the themes of gender norms, relations and LGBTH issues in addition to reproductive health.

T. Reply to paragraph 20 of the list of issues and questions

136. The gender pay gap between men and women is on average 16% in all labour sectors. During the 2016–2019 tripartite Equal Pay Programme the gap reduced from 17% to 16%. The economic crisis has affected the pace of potential pay increases. In

2016, the central labour market organisations negotiated a “Competitiveness Pact”; no pay raises in 12 months, some structural changes (average 24 working hours/year without compensation) and holiday bonuses were cut by 30% in the public sector in 2017–2019. The possibilities to reduce the gender pay gap were challenging. The key objective of the 2020–2023 Equal Pay Programme is to narrow the average gender pay gap more effectively than in previous programme periods.

137. The measures under the aforementioned Programme include *e.g.* increasing pay awareness, reporting on the effects of collective agreements on women’s and men’s pay and pay gap, supporting the reconciliation of work and family life and dismantling the traditional gender-based division of labour. Measures taken by labour market organisations include a survey for unions on how collective agreements promote pay systems based on the demands of work and a recommendation on the gender impact assessments of collective agreements.

138. Ministry of Social Affairs and Health has launched several projects, based on the Government Programme, to reduce the gender pay gap. The project to dismantle the gender segregation of working life will operate in 2021–2023 and produce a new, permanent model and a regional cooperation structure to dismantle gender segregation in working life especially in strongly segregated sectors. Other projects concern the development of the pay systems to support equal pay for work of equal value, and gender impact assessment of the main collective agreements to promote gender impact assessment as a means of achieving equal pay.

139. The 2021–2022 project “Work of Equal Value” will look at the assessment of the complexity of work and work of equal value.

140. The gender pension gap is mostly due to gender pay gap and segregated labour market. Salaries and careers in general have an impact on earning-related pension accruals. A project in 2018–2020 focused on promoting gender equality of pensions. It *e.g.* compiled and distributed information about the pension gap to decision-makers and citizens.

141. The Government is preparing its proposal for the reform due to enter into force in August 2022. The reform will give both parents each a quota of 160 daily allowance days per child. A parent will be allowed to transfer up to 63 daily allowance days of their own quota to the other parent, other custodian, their spouse or the spouse of the other parent. There will also be a pregnancy allowance period for the 40 final days of pregnancy bringing the total to 360 days, roughly two months higher than presently.

142. Furthermore, the reform promotes flexible working hours and arrangements. A right to unpaid careers’ leave for up to five days per year would be introduced for situations where *e.g.* a relative suddenly needs help.

143. The reform implements both the objectives of the Government Programme and the changes resulting from the EU’s Work-life Balance Directive, and aims to promote gender equality in working life and facilitate the reconciliation of work and family life. The reform encourages fathers to take better advantage of the family leave system and greater responsibility for childcare. Greater consideration will be given to the equal treatment of diverse families. Single parents would have the right to use the parental allowance quotas of both parents.

144. Efforts to narrow the pay gap between women and men in the Åland Islands are included in the action plan of the Government of Åland and are already under way in the form of pay surveys.

U. Reply to paragraph 21 of the list of issues and questions

145. Finland has not launched separate policy measures to promote employment for women with disabilities. Several indicators indicate that women's situation in the labour market is somewhat better, when it comes to women with disabilities. Women account for slightly more than half (51%) of the unemployed jobseekers with disabilities, which reflects their share of the working-age population. Women with disabilities seem to have a lesser risk for prolonged unemployment. For example, unemployment ends within three months of the onset of unemployment more often for disabled women than disabled men. Average length of unemployment is on average 7 weeks shorter for women compared for men (27 vs. 34 weeks).

146. In 2019, a total of 24.2% of the beneficiaries receiving disability pension from the earnings-related pension scheme worked at the same time. At the end of 2019, women accounted for 65% of all such persons. Women accumulate slightly more months of work per year than men. This derives at least from the fact that disability pension is granted more often as a partial pension and is more common in the female-dominated public sector. By default, receivers of partial disability pensions are expected to have a part time work and to receive part of their incomes from earnings. About 80% of those on partial disability pension are in work. In addition, women's average pension is 75% of men's average pension, which at least partially encourages increasing income through employment.

147. Women are seen to participate in working life through services more often than men, regardless of the service provider. For example, 55.2% of those who received training or a try-out as a public employment service were women in 2020. This in turn leads gender differences in employment results. Un 2020, 58% of the unemployed with disabilities who had found employment on the open labour market were women.

148. In 2019, 65.6% of those receiving vocational rehabilitation from the earnings-related pension scheme were women and 55.5% of those receiving corresponding rehabilitation organised by the Social Insurance institution of Finland were women.

149. The Government of Åland has trained migrants to guide their peers on social and health care issues, including gender equality, in their native language.

V. Reply to paragraph 22 of the list of issues and questions

150. The Parliament accepted the Government proposal on health and social service reform in summer 2021. The reform aims *e.g.* to reduce inequalities in health and wellbeing; safeguard equal and quality health and social services for all; improve the availability and accessibility, and ensure the availability of skilled labour. There will be 21 wellbeing service counties and a city of Helsinki that would be entrusted with the health and social services duties that are currently the responsibility of local municipalities. The reform will also strengthen the central government's role in guidance and direction of the health and social services.

151. In relation to mental health services and suicide prevention, the legislative drafting process reforming the right to self-determination and mental health and substance abuse services in order to improve mental health services and their availability has been commenced, in accordance with the Government programme. Also, a national mental health strategy 2020–2030 was published in February 2020.

152. The Ministry of Social Affairs and Health is preparing legislative proposals regarding the transgender persons (so-called Trans Act). The Ministry appointed, in 2019, a preparatory working group to map out alternative ways to develop legislation

concerning transgender persons and other gender minorities. The Group published its report in January 2020. The preparation is continued by a working group set up in 2021 that will prepare the legislative proposal, which is to be submitted to Parliament in spring 2022. The law should enter into force the same year. The views of international human rights bodies as well as the international and domestic human rights organisations will be taken into account in the process. The new legislation will strengthen the fulfilment of individual's right to self-determination. A follow-up and evaluation group has been appointed. It consists of representatives of civil society, health care, and Ombudsmen.

153. Abortion is performed by health care professionals. In 2019, there were approximately 8,700 abortions, *i.e.* approximately 7.7 abortions per thousand women of childbearing age (15–49 years).

154. The Finnish Immigration Service has prepared guidelines on initial health examinations for asylum seekers, detained aliens and victims of THB to promote the implementation of health care, as well as the high-quality and uniform operation of reception centres and detention units when carrying out initial health checks.

155. Asylum seekers, detained persons and undocumented victims of THB (who have been referred and admitted to the Assistance System) are entitled to essential health services based on an assessment of the individual need for treatment.

156. In general, the municipalities do not offer free contraception, but municipalities do provide contraceptive advice.

157. In 2020, 136 new HIV infections were detected (2.5 per 100,000), 74 % in men. By the end of 2020, a total of 4,326 HIV infections had been diagnosed in Finland. In 2020, thirteen new cases of AIDS were reported, eight of them by Finns and five by foreigners.

158. Occurrence of other sexually transmitted diseases between 1995–2001: Syphilis 4885 infections, 206 in 2020; Gonorrhoea 8231 infections, 439 in 2020; Chlamydia 350,661 infections, 5,174 in 2020.

W. Reply to paragraph 23 of the list of issues and questions

159. According to the Government Programme, the Ministry of Justice has prepared a National Action Programme to combat racism and to promote good relations for 2021–2023. Gender equality is mainstreamed throughout the implementation and evaluation of the Programme. Multiple discrimination will be discussed especially in the various training and capacity-building activities.

160. In October 2021, the Government appointed the Truth and Reconciliation Commission Concerning the Sámi People. The aim is to collect Sámi people's experiences of the actions of the state and its various authorities and to make this information visible to the public. The Prime Minister's Office is responsible for the process.

161. The accessibility plan for higher education and higher education institutions was published in 2021. It includes a review of how social, regional and linguistic equality is realised in higher education and presents objectives and policies for promoting accessibility specifically for under-represented population groups and minority groups.

162. The Ministry of Education and Culture has awarded grants for collaborative and networked projects to develop teachers' pre-service, introductory education and life-long professional learning. The project called *Ketterä korkeakoulu* introduces new and more effective models for the training of Sámi and Sámi teachers. The Ministry

of Education and Culture is also funding a pilot project (2018–2021) for utilizing remote connections in teaching of Sámi languages. The University of Oulu has a quota for Sámi speakers in teacher training in early childhood education and care. The national Human Rights Center has provided new training course and material for teachers on rights of indigenous peoples.

163. A report on the overall situation of female prisoners by the Criminal Sanctions Agency, published in 2020, showed that the situation of female prisoners needs to be improved. A project was set up for 2020–2023. Female prisoners can now be placed in two open prisons intended exclusively for women nationwide. The same is in progress in closed prisons: female prisoners will get separate prison wards.

164. In general, the same rehabilitation services are available to male and female prisoner. One programme is directed specifically for women addressing themes *e.g.* rehabilitation options, self-esteem, parenthood, criminal behaviour and substance abuse. A trauma-informed approach has become important with female prisoners. Neuropsychiatric disorders and mental health problems are observed more often than in the case of male prisoners.

165. The health care and mental health care services are provided by the Health Care Services for Prisoners, part of the public social welfare and health care system. If needed, prisoners may be transferred to the Psychiatric Hospital for Prisoners or a public hospital outside the prison. Prisoners can also be placed in a substance rehabilitation institution outside the prison.

166. The Åland Islands have a disability policy programme (2017–2020), which will be updated in 2022.

X. Reply to paragraph 24 of the list of issues and questions

167. A gender perspective is integrated in national climate change adaptation policy making according to national legislation, namely the Equality Act. Women and men have equal rights of representation and of ownership of land and natural resources such as water and forests.

168. Women are well represented in the preparation of national adaptation policy and hold various leading positions in national preparatory bodies and monitoring groups related to climate change adaptation policy. Gender is also routinely included in climate change vulnerability assessments along with other factors influencing vulnerability and adaptive capacity.

169. Finland is strongly committed to implementing the enhanced Lima work programme on gender and its gender action plan. Gender-policy has been mainstreamed in Finnish climate policy. Finland has prepared gender impact assessments in relation to climate policy (2017 and 2021). A working group on gender mainstreaming has been established in the Ministry of Environment.

170. Women are strongly represented in climate leadership positions. Finland's current and previous chief negotiators for the UNFCCC have been women, the Minister of the Environment and Climate Change is a woman, as is the next minister to follow in a rotation in the summer of 2022, and the current and the previous youth delegates at the UN climate negotiations have been female. Finland also has a national gender focal point to the UNFCCC. The Finnish Prime Minister (a woman) is leading the high level Climate Change Policy Roundtable. The Equality Act also includes a gender quota provision, which applies also to the Finnish Climate Change Panel.

171. Gender is one of the cross-cutting topics of Finland's development policy, including climate finance. A recent study of the National Audit office of Finland

examines the gender impacts of Finland's climate financing (Briefing paper: The objectives of climate finance include empowering women and girls – National Audit Office of Finland (vtv.fi)).

172. Plan International Finland recently published a report focusing on gender and climate foreign policy.

II. Annexes

1. Statistics on population.
 2. Statistics on contacts to the Ombudsman for Equality.
 3. Statistics on violence and harassment.
 4. Statistics on THB reported to police.
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