



**IACC HIGH-LEVEL SEGMENT  
MONITORING MECHANISM  
FINLAND  
2018-2022**

# Transparency International Finland

Transparency International Finland (TI FI) is an independent, non-profit NGO (Non-Governmental Organisations) working towards anti-corruption and increased transparency. The goal of TI FI is to fight against corruption while promoting accountability, transparency, and responsibility in Finnish society. TI FI is part of the international network of Transparency International.

Authors: Ilkka Penttinen Fouto, Mari Laakso and Tanja Tamminen

Reviewer: Isabelle Büchner

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# EXECUTIVE SUMMARY

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## SUMMARY OF FINDINGS

Total number of commitments made at the 18 <sup>th</sup> IACC	11
Total number of commitments selected for monitoring	6

Current level of progress in commitment implementation	
Number of fulfilled commitments	3
Number of partially fulfilled commitments	2
Number of commitments not fulfilled/dropped	1

## KEY CHALLENGES TO COMMITMENT IMPLEMENTATION

The Finnish government committed to 11 different actions in their 18th International Anti-Corruption Conference national statements.<sup>1</sup> The wording of the commitments is generally vague and often does not include clear, measurable actions. Most commitments were only further operationalised in 2021 with the National Anti-Corruption Strategy.<sup>2</sup> There is not always a clear explanation of how the Finnish government wants to progress in its anti-corruption work. Most of the IACC commitments are aimed at continuing work rather than enhancing it. Nonetheless, due to the measurability, only six of eleven commitments were selected for monitoring based on Transparency International's IACC Monitor methodology.<sup>3</sup>

Some commitments have experienced delays in their implementation. One of the six analysed is not fulfilled, and two are only partially fulfilled. The main challenges to implementation in these unfulfilled cases are:

- Delayed implementation of the EU (European Union) whistleblower Directive: According to the Ministry of Justice, the transposition of EU legislation to Finnish legislation proved challenging due to the extent of the legislation and public consultation feedback. Other EU

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<sup>1</sup> Finnish Government, Statement by Finland in the high-level segment of the International Anti-Corruption Conference 2018 in Copenhagen, [https://iaccmonitor.org/wp-content/uploads/2020/09/Finland\\_National\\_Statement\\_2018.pdf](https://iaccmonitor.org/wp-content/uploads/2020/09/Finland_National_Statement_2018.pdf); Ministry for Foreign Affairs of Finland, International Anti-Corruption Conference 2018 in Copenhagen: Anti-corruption statement, [https://iaccmonitor.org/wp-content/uploads/2020/09/Finland\\_MFA\\_Statement\\_2018.pdf](https://iaccmonitor.org/wp-content/uploads/2020/09/Finland_MFA_Statement_2018.pdf)

<sup>2</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

<sup>3</sup> IACC Monitor, Anti-Corruption Commitment Monitoring Tool, [https://iaccmonitor.org/wp-content/uploads/2020/11/TI-IACC-MONITOR\\_20200504\\_WEB.pdf](https://iaccmonitor.org/wp-content/uploads/2020/11/TI-IACC-MONITOR_20200504_WEB.pdf)

countries have also faced delays, although eight countries had implemented the Directive by March 2022.

- Funding development-policy actions on tax matters: changes of resource allocation priorities between different governments.

## KEY OPPORTUNITIES TO ACCELERATE COMMITMENT IMPLEMENTATION

### The European Union

The Government of Finland should use the multiple forums provided by the EU to exchange information, experiences, and best practices with other member states. The government should also make better use of the support in policy and programme implementation the EU provides through funding, technical assistance and experience-sharing opportunities. This includes the anti-corruption experience-sharing programme and workshops, regular and ongoing European Commission funding to support a wide range of projects via Internal Security Funds or European Structural and Investment Funds and the Structural Reform Support Service.<sup>4</sup>

### Council of Europe – GRECO recommendations

Finland underwent its fifth round of evaluation by the Group of Nations Against Corruption (GRECO) in 2017,<sup>5</sup> and was found to have complied to a satisfactory level with only one of the 14 recommendations as assessed in 2020.<sup>6</sup> GRECO's recommendations on compliance should therefore be accelerated.

### OECD Working Group on Bribery – Phase 4 Evaluation Report

Finland received its final fourth phase of evaluation in 2017.<sup>7</sup> Subsequent recommendations by the OECD in 2021 also need to be considered to further strengthen the Finnish anti-bribery regime.<sup>8</sup>

### Open Government Partnership – Finland Action Plan 2019-2023

Finland has been a member of the Open Government Partnership (OGP) since 2012 and has submitted four action plans, the latest covering 2019-2023.<sup>9</sup> The OGP action plans are assessed by an Independent Reporting Mechanism, providing thorough recommendations to the Finnish government. In addition, the OGP provides technical assistance, peer learning and support for in-country stakeholders and relevant partners, which can support implementation of anti-corruption actions.<sup>10</sup>

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<sup>4</sup> European Commission, Corruption, [https://ec.europa.eu/home-affairs/corruption\\_en](https://ec.europa.eu/home-affairs/corruption_en)

<sup>5</sup> Council of Europe, GRECO Evaluations, [https://www.coe.int/en/web/greco/evaluations#{%2222359946%22:\[0\]}](https://www.coe.int/en/web/greco/evaluations#{%2222359946%22:[0]})

<sup>6</sup> GRECO, Fifth Evaluation Round Compliance Report Finland, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a0b0ca>

<sup>7</sup> OECD, "OECD recognises Finland's commitment to combat corruption, but is concerned about lack of foreign bribery enforcement", <https://www.oecd.org/corruption/oecd-recognises-finland-s-commitment-to-combat-corruption-but-is-concerned-about-lack-of-foreign-bribery-enforcement.htm>

<sup>8</sup> OECD Legal Instruments, Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions, <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0378>

<sup>9</sup> OGP, Finland Action Plan 2019-2023, <https://www.opengovpartnership.org/documents/finland-action-plan-2019-2023/>

<sup>10</sup> OGP, "OGP Support to Countries and Locals", <https://www.opengovpartnership.org/ogp-support-to-countries-and-locals/>

## The UN (United Nations) Convention against Corruption – national implementation review

Finland went through its final second-round review of implementing the UN Convention against Corruption in 2011.<sup>11</sup> On top of the recommendations from the review, the government should also make use of the Implementation Review Group's technical assistance and use the convention as a space for exchanging expert knowledge.<sup>12</sup>

## KEY RECOMMENDATIONS

Based on a comprehensive assessment in this report, the Finnish government should implement the following measures:

### Support the implementation of the National Anti-Corruption Strategy

- Regularly assess and publish progress, to identify any gaps in implementation.
- Ensure the comprehensive implementation of the EU Whistleblower Directive.
- Assess corruption risks at national, regional, and local levels after the implementation of the key actions proposed in the Strategy.

### Close existing gaps in the anti-corruption framework

- Implement Finland's planned lobbying transparency register using Transparency International recommendations regarding scope, usability, and user needs.<sup>13</sup> Broaden the scope of the draft law on implementing a transparency register to include all decision-makers that are subject to lobbying and close gaps identified by the Ministry of Justice's report on the current state of lobbying in Finland at the state level.<sup>14</sup>
- Raise risk awareness and provide necessary tools and access to databases for the Ministry of Foreign Affairs' private partners, enabling them to conduct more in-depth due diligence.
- Make beneficial ownership registers fully public and ensure that all data is machine-readable and added to the government's Open Data Portal (as with any other datasets).

### Improve future anti-corruption commitments

- Link future anti-corruption commitments to the National Anti-Corruption Strategy.
- Coordinate different ministries' commitments and publish them jointly.
- Make sure commitments are not formulated vaguely and identify specific policy areas that need to be improved and outline concrete actions on how progress will be achieved.

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<sup>11</sup> UNODC Implementation Review Group, Executive summary: Finland, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/30May-3June2011/V1183299e.pdf>

<sup>12</sup> UNODC Implementation Review Group, Sessions of the Implementation Review Group, <https://www.unodc.org/unodc/en/corruption/IRG/implementation-review-group.html>

<sup>13</sup> Transparency International Finland, Request for an opinion from the Parliamentary Steering Group and the Expert Working Group report: a draft government proposal for a transparency register law, [https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/94d5a7b4-8608-4453-8e82-cb2ce2ece972/LAUSUNTO\\_20220131183805.PDF](https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/94d5a7b4-8608-4453-8e82-cb2ce2ece972/LAUSUNTO_20220131183805.PDF)

<sup>14</sup> Ministry of Justice Finland, Towards more open lobbying: The current state of lobbying in Finland at the state level, <https://julkaisut.valtioneuvosto.fi/handle/10024/162855>

# INTRODUCTION

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The 18th International Anti-Corruption Conference in Copenhagen featured a series of high-level meetings among countries in the Organisation for Economic Co-operation and Development (OECD) and non-OECD members, as well as international and regional organisations. As part of these meetings, participants made statements on the steps that each intends to take to make anti-corruption progress. These commitments are based on existing commitments, such as Open Government Partnership (OGP) action plans, the UK summit, the United Nations Convention against Corruption (UNCAC), OECD instruments and the Sustainable Development Goals (SDGs).<sup>15</sup> Participants at the high-level meetings agreed to establish a follow-up mechanism engaging all stakeholders, including governments, international and regional organisations, companies and civil society, in monitoring the implementation of these commitments.

The aims of the follow-up mechanism are to:

- assess progress towards implementation of the commitments
- provide further analysis on, and complement, other reporting mechanisms
- focus on the qualitative nature of the commitments, rather than quantitative scoring or ranking
- provide insight into what has and has not worked, and why
- provide insight into the opportunities and challenges for implementation, as a basis for understanding where technical support should be targeted.

The follow-up mechanism aims to capture the context and conditions under which the commitments are being implemented, as well as record progress in their implementation. It provides further analysis on other reporting mechanisms, and complements them, rather than duplicating them.

This report presents the results of the first round of monitoring for Finland.

It contains the following sections:

1. Filtering of commitments: assessment of Finland's commitments in their national statements for monitoring, based on their level of specificity and measurability, and the feasibility of monitoring them.
2. Analysis of the Finnish context: a brief analysis of the extent to which the overall commitments are considered pertinent to the country context.
3. Progress in implementing the commitments: the level of progress in the commitments selected for monitoring, as well as the challenges and opportunities for implementation.
4. Recommendations: key measures to accelerate implementation of the commitments.

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<sup>15</sup> Transparency international, 18th IACC High-Level Segment Commitments, <https://iaccseries.org/18th-iacc/18th-iacc-high-level-segment-commitments/>

# FILTERING OF COMMITMENTS

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For the High-Level Segment at the IACC 2018, Finland submitted two sets of commitments: the national-level statement<sup>16</sup> and a statement by the Ministry for Foreign Affairs.<sup>17</sup> In this report, we combined some commitments from the two statements, due to their similar nature. In total, Finland presented 11 commitments at the IACC. Of these, we deemed it feasible to monitor six, based on their level of specificity and measurability. Below is an overview of our filtering of the commitments:

## COMMITMENT 1: Draft a National Anti-Corruption Strategy

IS THE COMMITMENT SPECIFIC? YES

This commitment can be considered specific because the National Anti-Corruption Strategy is an important mechanism to move the country towards achieving recognised anti-corruption standards.

IS THE COMMITMENT MEASURABLE? YES

Drafting a National Anti-Corruption Strategy can be identified as a measurable action. However, "drafting" as a word limits the action and does not automatically imply that the government will finalise and publish the strategy. However, it can be assumed that this is primarily a wording issue, because the first draft of the strategy was published in 2017.<sup>18</sup>

IS THE COMMITMENT SELECTED FOR MONITORING YES

**COMMITMENT 2: Facilitate anonymous/confidential reporting of suspected corruption, strengthen the capacity of authorities receiving reports of corruption to process the reports effectively and confidentially, reinforce cooperation between the authorities, and strengthen key structures for protecting whistleblowers.**

IS THE COMMITMENT SPECIFIC? YES

The commitment can be divided into four sub-commitments. They can be considered specific because they relate to a clear policy area: whistleblower protection.

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<sup>16</sup> Finnish Government, Statement by Finland in the High-Level Segment of the International Anti-Corruption Conference 2018 in Copenhagen, [https://iaccmonitor.org/wp-content/uploads/2020/09/Finland\\_National\\_Statement\\_2018.pdf](https://iaccmonitor.org/wp-content/uploads/2020/09/Finland_National_Statement_2018.pdf)

<sup>17</sup> Ministry for Foreign Affairs of Finland, International Anti-Corruption Conference 2018 in Copenhagen: Anti-corruption statement, [https://iaccmonitor.org/wp-content/uploads/2020/09/Finland\\_MFA\\_Statement\\_2018.pdf](https://iaccmonitor.org/wp-content/uploads/2020/09/Finland_MFA_Statement_2018.pdf)

<sup>18</sup> Finnish Government, Anti-corruption Draft Network Anti-Corruption Strategy, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML\\_14\\_2017\\_Korruptio\\_strategia.pdf](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML_14_2017_Korruptio_strategia.pdf)

IS THE COMMITMENT MEASURABLE? YES

The language of the sub-commitment itself does not identify clear, measurable actions. It is unclear (1) how the government wants to provide anonymous or confidential whistleblower reporting (2) how it aims to strengthen the capacity of authorities receiving reports of corruption to process these reports (3) how it wants to reinforce the cooperation between the authorities in addressing these reports, and (4) how it aims to strengthen key structures for the protection of whistleblowers. It is also unclear what is meant by "key structures". However, further research shows that this commitment is linked to the EU's Whistleblower Directive<sup>19</sup> and the later operationalisation of this commitment in the National Anti-Corruption Strategy.<sup>20</sup> Therefore, the following measurable actions can be identified:

- 2.1 Fully implement the EU Whistleblower Directive. In particular:
  - a) Set up anonymous/confidential reporting mechanisms in line with the standards for confidential reporting channels (Chapter II of the Directive). (1)
  - b) Set up protective measures for whistleblowers (Chapter IV). (4)
- 2.2 Organise training for those receiving and processing reports and for the authorities and companies participating in the protection. (2)
- 2.3 Reinforce cooperation between the authorities. (3)
  - a) Set up an operational cooperation group to enhance the fight against corruption and to improve coordination between the authorities.
  - b) Ministries appoint contact persons for the prevention and combatting of corruption to draw attention to corruption issues within their own organisation.

IS THE COMMITMENT SELECTED FOR MONITORING YES

**COMMITMENT 3: Ministry for Foreign Affairs will establish a comprehensive risk management policy in line with the recommendations of the OECD Development Assistance Committee Peer Review in 2017, also taking stock of the Committee recommendations on corruption risk management.**

IS THE COMMITMENT SPECIFIC? YES

The commitment can be considered specific because it targets a concrete thematic priority: corruption risk management. "Corruption risk management (CRM) is a specific set of procedures and requirements to detect, assess, and mitigate corruption risks within an organisation. It is an important part of implementing anti-corruption policy."<sup>21</sup>

IS THE COMMITMENT MEASURABLE? YES

<sup>19</sup> European Union, Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons who Report Breaches of Union Law, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937>

<sup>20</sup> Finnish Government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

<sup>21</sup> U4 Anti-Corruption Resource Centre, What we mean by corruption risk management, <https://www.u4.no/topics/corruption-risk-management/basics>

The commitment identifies the measurable action of establishing a risk management policy in line with the 2017 OECD Development Assistance Committee Peer Review recommendations. This should include:

- a) "Guidance for how the overall country programme might be better adapted or how different instruments might work together to mitigate risks"
- b) "How planning and programming should prepare for, and respond to, political and security uncertainty".<sup>22</sup>

IS THE COMMITMENT SELECTED FOR MONITORING YES

**COMMITMENT 4: The Ministry for Foreign Affairs shall increase number of staff who have received mandatory training on prevention of corruption risk and continue to support awareness raising and capacity building of stakeholders, including NGOs and the private sector.**

IS THE COMMITMENT SPECIFIC? NO

The commitment relates to the second key area of the National Anti-Corruption Strategy (2. Raising awareness of corruption), which focuses on increasing training and corruption awareness in the public and private sectors, and political activities.<sup>23</sup> However, the commitment is unspecific in terms of the nature of the training or the personnel scope and gives little detail on external stakeholders. Therefore, the commitment is not considered specific.

IS THE COMMITMENT MEASURABLE? NO

Overall, this commitment lacks measurable actions. It outlines the action to "increase the number of staff who have received mandatory training on preventing corruption risk". However, it lacks clarity on what "increase" means and what group of staff that might be prone to corruption risks is targeted. In addition, the subsequent wording of the commitment on supporting awareness raising and capacity building of stakeholders does not identify clear actions that describe how the ministry plans to raise awareness and build the capacity of these stakeholders. For future commitments in this area, the commitment language should specify which group of staff should receive mandatory training and set a clear threshold for the number of staff (or make it compulsory for all). It should further specify thematic areas for the training programmes and projects. The awareness-raising part of the commitment also needs to be tied to concrete measures to increase the awareness of corruption risks among the specific stakeholders.

IS THE COMMITMENT SELECTED FOR MONITORING NO

<sup>22</sup> OECD, OECD Development Co-operation Peer Review, [https://read.oecd-ilibrary.org/development/oecd-development-co-operation-peer-reviews-finland-2017\\_9789264287235-en#page4](https://read.oecd-ilibrary.org/development/oecd-development-co-operation-peer-reviews-finland-2017_9789264287235-en#page4)

<sup>23</sup> Finnish Government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

**COMMITMENT 5: In the Addis Tax Initiative we have committed to doubling Finland's support for strengthening developing countries' domestic resource mobilisation by 2020.**

IS THE COMMITMENT SPECIFIC? YES

This commitment is specific, as it identifies financial "support for strengthening developing countries' domestic resource mobilisation" as a concrete policy instrument. The Addis Tax Initiative is an existing partnership based on a declaration, which sets the scope of the action.<sup>24</sup> The government had already committed to doubling its funding before the IACC in 2018. However, as the commitment implementation was still ongoing, it is considered specific.<sup>25</sup>

IS THE COMMITMENT MEASURABLE? YES

The commitment includes the measurable action of "doubling Finland's support for strengthening developing countries' domestic resource mobilisation" from the 2015 level by 2020. According to the official website of the Addis Tax Initiative, in 2015, the Finnish funding was \$4.538 million (roughly €4.3 million) which would imply a 2020 target of \$9.076 million (roughly €8.6 million).<sup>26</sup> This is in line with the amount in Euro published in 2020 in the Ministry of Foreign Affairs' Taxation for development Action Programme 2020–2023 (€8.6 million).

IS THE COMMITMENT SELECTED FOR MONITORING YES

**COMMITMENT 6: Finland has established a Tax and Development Action Program (TDAP). The objective of the program is to promote international cooperation to adopt revised international tax rules and to curb illicit financial flows. These rules should also take into account developing countries' perspectives.**

IS THE COMMITMENT SPECIFIC? YES

The commitment relates strongly to the previous one, as the Addis Tax Initiative is managed under the Finnish government's Tax and Development Action Program (TDAP). This commitment also identifies the TDAP as a specific anti-corruption mechanism.

IS THE COMMITMENT MEASURABLE? NO

The commitment does not identify clear, measurable actions. It is unclear how Finland aims to "promote international cooperation to adopt revised international tax rules and to curb illicit financial flows". There is also no clear plan on how the government aims to use the TDAP to progress international tax rules and curb illicit financial flows.

<sup>24</sup> Addis Tax Initiative, Finland, <https://www.addistaxinitiative.net/es/node/87>

<sup>25</sup> Addis Tax Initiative, Finland, <https://www.addistaxinitiative.net/es/node/87>

<sup>26</sup> Addis Tax Initiative, Finland, <https://www.addistaxinitiative.net/profile/finland>

IS THE COMMITMENT SELECTED FOR MONITORING NO

**COMMITMENT 7: Enhance monitoring of procurement and expanding procurement units' access to information, as well as by increasing procurement units' opportunities to intervene in cases of corruption they detect. Corruption will be prevented both through legislative reforms and guidance, and particularly by providing practical information to procurement units.**

IS THE COMMITMENT SPECIFIC? YES

This commitment identifies a specific anti-corruption mechanism, which is the work of procurement units. Corruption in public procurement is considered one of the most high-risk areas in Finland, as highlighted by the National Competition Authority's annual reports<sup>27</sup> and the national anti-corruption network.<sup>28</sup>

IS THE COMMITMENT MEASURABLE? YES

Based on the wording of the commitment, it is unclear what concrete actions the government plans to implement to enhance procurement, how it aims to expand access to information for the procurement units, and which measures it wants to use to increase procurement units' opportunities to intervene in cases of corruption. Based on further desk research, the following measurable actions from the National Anti-Corruption Strategy<sup>29</sup> can be identified in relation to this commitment:

- 7.1 Organise thematic training on the risks of corruption for officials, internal auditors and elected officials engaging in procurement. (1)
- 7.2 Expanding procurement units' access to information: (2)
  - a) Examine means for promoting access to information on direct procurements.
  - b) Investigate means to improve access to information for contracting entities in connection with procurements.
  - c) Investigate the possibility of requiring declarations of private interests from persons involved in procurement preparations or other means of preventing conflicts of interest.
- 7.3 Improve the competence of persons working with public procurement in procurement processes and procurement legislation by increasing training as part of the activities of the Public Procurement Advisory Unit, and the implementation of the objectives related to the "Effective Public Procurement Operational Program" (Hankinta-Suomi programme).<sup>30</sup>

IS THE COMMITMENT SELECTED FOR MONITORING YES

<sup>27</sup> Finnish Competition and Consumer Authority, Public Procurement Control Results Reporting 2020, <https://www.kkv.fi/uploads/sites/2/2021/12/julkisten-hankintojen-valvonnan-tulosten-raportointi-2020.pdf>

<sup>28</sup> Ministry of Justice Finland, Fight against Corruption: Public Procurement and Fair Tenders, <https://korrupziontorjunta.fi/julkiset-hankinnat>

<sup>29</sup> Finnish Government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

<sup>30</sup> In 2019 the Ministry of Finance has set up the Effective Public Procurement Operational Program (Hankinta-Suomi) to draw up a national public procurement strategy, increase co-operation between public procurement actors and develop the effectiveness of procurement.

**COMMITMENT 8: Promote detection of corruption offences and imposition of criminal liability through targeted education and by preparing corruption identification guidelines for all authorities involved in the process of combatting crime.**

IS THE COMMITMENT SPECIFIC? YES

This commitment identifies a specific anti-corruption mechanism, "corruption identification guidelines", for authorities involved in combatting crime.

IS THE COMMITMENT MEASURABLE? YES

Based on the language of the commitment, it is unclear (1) what is meant by "targeted education" and (2) which specific authorities involved in combatting crime are referred to. Based on further desk research, the following measurable actions from the National Anti-Corruption Strategy<sup>31</sup> can be identified in relation to this commitment:

8.1 Targeted education: Give specialised, and when necessary, joint training sessions on corruption to special prosecutors, police officers, the staff at courts of law and the Financial Intelligence Unit. (1)

8.2 Preparing corruption identification guidelines for all authorities involved in the process of combatting crime (meaning the authorities from the previous commitment: special prosecutors, police officers, the staff at courts of law and the Financial Intelligence Unit). (2)

IS THE COMMITMENT SELECTED FOR MONITORING YES

**COMMITMENT 9: Support further development of cooperation between criminal investigation and other authorities and thereby enhance the process of combatting crime.**

IS THE COMMITMENT SPECIFIC? NO

This statement identifies cooperation between criminal investigation and other authorities as a target area. However, it is only a general statement of support and lacks a concrete policy instrument or mechanism. Therefore, this commitment cannot be considered specific.

IS THE COMMITMENT MEASURABLE? NO

This commitment cannot be considered measurable. It lacks concrete, measurable action on how the government planned to support the further development of cooperation between criminal investigation and other authorities.

IS THE COMMITMENT SELECTED FOR MONITORING NO

<sup>31</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

**COMMITMENT 10: The Ministry for Foreign Affairs will continue to contribute to the implementation of SDG 16, Peace, Justice, and Strong Institutions, through its development assistance, including cooperation with civil society.**

IS THE COMMITMENT SPECIFIC? NO

This statement is a general statement of support for SDG 16: Peace, Justice, and Strong Institutions. It lacks a sufficiently narrow policy area or concrete anti-corruption mechanism, and merely describes the continuation of existing anti-corruption work.

IS THE COMMITMENT MEASURABLE? NO

The commitment neither identifies any measurable ways in which the Ministry for Foreign Affairs wants to use its development assistance to civil society, nor how it plans to cooperate with civil society.

IS THE COMMITMENT SELECTED FOR MONITORING NO

**COMMITMENT 11: The Foreign Ministry is a member of the International Aid Transparency Initiative (IATI) and will continue to make further progress with regards to aid transparency.**

IS THE COMMITMENT SPECIFIC? NO

This commitment identifies the International Aid Transparency Initiative (IATI) as a specific anti-corruption mechanism. However, it is merely a description of existing anti-corruption work Finland had begun before the IACC in 2018. Therefore, it cannot be considered specific enough for monitoring.

IS THE COMMITMENT MEASURABLE? NO

The wording of the commitment does not identify any measurable actions through which the Foreign Ministry will use its IATI membership to further progress aid transparency. The ministry has taken steps forward, such as launching the new OpenAid portal, but this was not explicitly mentioned in the commitment itself. In future commitment-setting processes, the Finnish Foreign Ministry should make commitments that include concrete actions on how it plans to further progress aid transparency.

IS THE COMMITMENT SELECTED FOR MONITORING NO

# COUNTRY CONTEXT

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## Country overview

Finland has traditionally been one of the highest-performing countries in Transparency International's *Corruption Perceptions Index*, ranking in the top six since the index was established in 1995 and topping it between 2000 and 2004, and in 2006, 2007 and 2012.<sup>32</sup> As a typical Nordic country, it also ranks highly in other comparative indexes on democracy, media freedom, protection of civic space and public integrity.<sup>33</sup>

In terms of petty corruption, the risk in Finland is especially low. Transparency International's *Global Corruption Barometer* (GCB) 2021 shows that the bribery rate is as little as 1 per cent overall. While 16 per cent of Finnish GCB respondents think corruption had increased in the past 12 months, 8 per cent believed it had decreased.<sup>34</sup> This result is similar to the earlier 2013 perception, when 44 per cent of Finnish respondents felt that corruption had increased in the past two years, while 11 per cent believed it had decreased.<sup>35</sup>

Due to these positive rankings, the anti-corruption plan in the latest Finnish OGP Action Plan, primarily refers to Finland's support for anti-corruption measures in other countries and focuses less on tackling corruption in Finland itself.<sup>36</sup> However, notable corruption challenges within the country remain.

## Key corruption challenges

Empirical evidence suggests that Finnish society has a high level of trust (including trust between individuals and confidence in public institutions). While there are some interconnected factors between high trust and lower corruption levels, academic studies also find that the control of corruption, especially in terms of petty corruption such as bribery, has been relatively successful.<sup>37</sup>

Despite the generally low-risk environment, some systemic risks still require policy reform, such as conflicts of interest, nepotism, the "revolving door" phenomenon, undue influence, or irresponsible privatisation of public services.<sup>38</sup> Practices in grey areas, such as conflicts of interests and influencing

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<sup>32</sup> Transparency International, Corruption Perception Index Finland 2012-2021, <https://www.transparency.org/en/cpi/2021/index/fin>

<sup>33</sup> Economist Intelligence Unit, Democracy Index 2020: In sickness and in health? <https://www.eiu.com/n/campaigns/democracy-index-2020/>; CIVICUS, CIVICUS Monitor – Tracking Civic Space, <https://monitor.civicus.org/>; Reporters Without Borders, 2021 World Press Freedom Index, <https://rsf.org/en/ranking>

<sup>34</sup> Transparency International, Transparency International Finland, <https://www.transparency.org/en/countries/finland>

<sup>35</sup> Transparency International, *Global Corruption Barometer* 8<sup>th</sup> Edition – 2013, <https://www.transparency.org/en/gcb/global/global-corruption-barometer-2013/press-and-downloads>

<sup>36</sup> OGP, Finland Action Plan 2019-2023, <https://www.opengovpartnership.org/documents/finland-action-plan-2019-2023/>

<sup>37</sup> Salmiinen, A. (2013), "Control of Corruption: The Case of Finland", Different Paths to Curbing Corruption (Research in Public Policy Analysis and Management, Vol. 23), Emerald Group Publishing Limited, Bingley, 57-77. [https://doi.org/10.1108/S0732-1317\(2013\)0000023003](https://doi.org/10.1108/S0732-1317(2013)0000023003); Popescu, L.-M., Dutulescu, S., and Nisulescu-Ashrafzadeh, I. (2019). Corruption Phenomenon in European Union. *European Journal of Business and Management Research*, 4(3). <https://doi.org/10.24018/ejbmr.2019.4.3.57>

<sup>38</sup> Ministry of Justice Finland, Aarne Kinnunen: Risks of corruption appear, <https://oikeusministerio.fi/blogi-hakutulos/-/blogs/aarne-kinnunen-korruptioriskit-nakyyiin->

the decision-making processes, are particularly subject to public debate.<sup>39</sup> The state anti-corruption website recognises the following sectors as especially risk-sensitive:<sup>40</sup>

- the construction sector
- public procurement and competitive tendering
- community planning
- political funding and decision-making
- foreign trade and its promotion
- development cooperation
- sports.

In addition, Finnish actors from both the public and private sectors operate in high-risk countries where the corruption risk environment is drastically different. Despite some high-profile cross-border corruption cases involving Finnish actors, cross-border enforcement of anti-corruption efforts has been challenging.<sup>41</sup>

In general, Finnish legislation has been mainly reactive to past corruption scandals, such as the campaign finance scandal in 2007, which led to additional regulation on party financing<sup>42</sup> and new legislation on campaign financing.<sup>43</sup> In addition, Finland has had notable past tax avoidance and money laundering cases. However, these often only led to minor judicial sentences or even lack of conviction.<sup>44</sup> All prominent tax avoidance and money laundering cases included cross-border financial flows. Transparency International's *Exporting Corruption* report further highlighted that there had been no new investigations of foreign corruption cases between 2016 and 2019. There are also shortcomings in related policies, including a lack of transparent enforcement information or a publicly available beneficial ownership register, and appropriate mitigation measures for the misuse of legal persons, as per Financial Action Task Force recommendations.<sup>45</sup>

The national authorities have acknowledged the need to increase anti-corruption measures to address the critical corruption challenges.<sup>46</sup> According to OECD monitoring, Finland has been taking steps to tackle risks related to bribery, previously highlighted by the organisation.<sup>47</sup>

Similarly, the country's new National Anti-Corruption Strategy addresses some shortcomings concerning public- and private-sector actors operating in high-risk environments. These include ensuring sufficient resources for the National Bureau of Investigation to combat foreign bribery, preparing guidelines for criminal investigators, prosecutors, and judges to identify, detect and prosecute foreign bribery, and providing prosecutors, courts, and judges with sufficient expertise.<sup>48</sup>

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<sup>39</sup> Natalia Ollus and Vesa Muttillainen, Risk areas for corruption in the Finland of the 2010s,

[https://www.theseus.fi/bitstream/handle/10024/97281/POLAMK\\_Raportti\\_115\\_web.pdf?sequence=1](https://www.theseus.fi/bitstream/handle/10024/97281/POLAMK_Raportti_115_web.pdf?sequence=1)

<sup>40</sup> Ministry of Justice Finland, Corruption in Finland, <https://korruptiontorjunta.fi/en/corruption-in-finland>

<sup>41</sup> Reuters, "Slovenian opposition leader convicted in bribery case", <https://www.reuters.com/article/uk-slovenia-corruption/slovenian-opposition-leader-convicted-in-bribery-case-idUKBRE9540EW20130605>

<sup>42</sup> Transparency International, "Persistently high corruption in low-income countries amounts to an 'ongoing humanitarian disaster'", [https://www.transparency.org/files/content/pressrelease/CPI\\_2008\\_press\\_kit\\_290908.pdf](https://www.transparency.org/files/content/pressrelease/CPI_2008_press_kit_290908.pdf)

<sup>43</sup> Finnish government, Law on Electoral Funding for Candidates, <https://www.finlex.fi/fi/laki/ajantasa/2009/20090273>

<sup>44</sup> Yle, Very small tax increases have been imposed in the Liechtenstein tax evasion case, <https://yle.fi/uutiset/3-6984649>

<sup>45</sup> Transparency International, *Exporting Corruption 2020 – Finland*,

<https://images.transparencycdn.org/images/Finland.pdf>

<sup>46</sup> Ministry of Justice Finland, Anti-corruption efforts, <https://oikeusministerio.fi/en/anti-corruption-activities>

<sup>47</sup> OECD, Phase 4 Written Follow-Up Report by Finland, [https://one.oecd.org/document/DAF/WGB\(2020\)27/final/en/pdf](https://one.oecd.org/document/DAF/WGB(2020)27/final/en/pdf)

<sup>48</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

## Anti-corruption measures overview

While Finland lacks separate legislation that addresses corruption, its legislation generally addresses corruption-related offences. These include bribery, fraud, embezzlement, money laundering, violation or misuse of a business secret, misuse of a position of trust, (negligent) breach of official secrecy, (aggravated) abuse of public office, (negligent) violation of official duty, and (aggravated) abuse of insider information. In addition, outside the Criminal Code, there are 21 legislative acts supporting anti-corruption and good governance practices, ranging from financial transparency and integrity to requirements for public officials.<sup>49</sup>

The Ministry of Justice coordinates anti-corruption work in Finland. Although there is no specific anti-corruption institution, multiple actors take responsibility for combating and preventing corruption. These range from law enforcement and judicial officials to organisations providing guidance and overseeing particular sectors and actors. The key anti-corruption actors in Finland are:

- Anti-Corruption Cooperation Network
- Ministry of Justice
- Police
- Ministry of Finance
- Finnish Tax Administration
- Finnish Competition and Consumer Authority
- Ministry for Foreign Affairs
- Parliamentary Ombudsman and Chancellor of Justice
- Association of Finnish Local and Regional Authorities.

To enhance and support these actors' joint efforts, the Ministry of Justice has set up a national anti-corruption cooperation network to promote and coordinate anti-corruption actions in Finland.<sup>50</sup> Members are responsible for implementing anti-corruption activities included in the National Anti-Corruption Strategy.

### Link to IACC commitments

With the drafting of the National Anti-Corruption Strategy, begun in 2015 by the Anti-Corruption Cooperation Network, the government set the basis for a national anti-corruption framework.<sup>51</sup> The final National Strategy and Action Plan were published in 2021, operationalising many IACC commitments.<sup>52</sup> They also address international recommendations from the EU, GRECO, OECD, Open Government Partnership, Organisation for Security and Cooperation in Europe and UN.

The IACC commitments address three specific areas: (1) systemic and institutional risks, such as lack of corruption awareness or the protection of whistleblowers, (2) high-risk areas of corruption, such as public procurement, and (3) external risks that relate to areas such as operations of the Finnish government, individuals, and companies across borders or in other high-risk environments. Different actors are therefore responsible for implementing the commitments, especially the Ministry of Justice and the Ministry of Foreign Affairs.

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<sup>49</sup> Ministry of Justice Finland, Work against Corruption – national legislation, <https://korruptiontorijunta.fi/en/national-legislation>

<sup>50</sup> Ministry of Justice Finland, Anti-Corruption Cooperation Network, <https://oikeusministerio.fi/en/project?tunnus=OM002:00/2019>

<sup>51</sup> Finnish government, Anti-corruption Draft Network Anti-Corruption Strategy, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML\\_14\\_2017\\_Korruptio\\_strategia.pdf](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML_14_2017_Korruptio_strategia.pdf)

<sup>52</sup> Finnish government, Comprehensive and Long-term Approach to Combat Corruption, <https://valtioneuvosto.fi/en/-/1410853/comprehensive-and-long-term-approach-to-combat-corruption>

Most of the IACC commitments were somewhat vague in their wording, only becoming more concrete in 2021 with the publishing of the National Anti-Corruption Strategy, supported by the Action Plan for 2021-2023. The measures include improving cooperation between the authorities, raising awareness of corruption, exposing cases of corruption, examining the functioning of anti-corruption legislation, and promoting research. The Action Plan contains 77 scheduled measures. Key development areas for combating corruption are:

1. Reinforcement and clarification of the official structures for preventing and combatting corruption, and improved cooperation between the parties involved.
2. Raised awareness of corruption.
3. Increased transparency, especially in decision-making and public services in general.
4. Promotion of the exposure of corruption.
5. Examination of the functioning of anti-corruption legislation and the development of legislation.
6. Promotion of research related to corruption and prevention.

Overall, the IACC commitments do not address some of the most pressing structural corruption risks. Highly relevant and necessary commitments are missing. For example, the creation of a lobbying transparency register and improving the declarations of private interests for safeguarding against conflict of interest. However, these were later addressed in Finland's OGP Action Plan 2019-2023.<sup>53</sup> In addition, the National Anti-Corruption Strategy includes measures to improve transparency in political decision-making. These include:

- establishing a lobbying register
- standardising declarations of interests to increase data transparency
- promoting transparency in business due diligence by creating a service that allows the public to scrutinise companies not fulfilling their statutory obligations as employers and contracting parties
- carrying out a joint Nordic anti-money laundering research project to analyse bribery offences and evidence requirements.<sup>54</sup>

While the scope of the IACC commitments is more limited than the National Anti-Corruption Strategy and Action Plan, this difference can be partially explained by the two-year gap between the 2018 IACC commitments and the strategy, which was published in 2020. Nonetheless, the Finnish anti-corruption measures are not limited to responding to the IACC commitments.

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<sup>53</sup> OGP, Finland Action Plan 2019-2023, [https://www.opengovpartnership.org/wp-content/uploads/2019/09/Finland\\_Action-Plan\\_2019-2023\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/09/Finland_Action-Plan_2019-2023_EN.pdf)

<sup>54</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

# PROGRESS ON COMMITMENT IMPLEMENTATION

## COMMITMENT 1: Draft a National Anti-Corruption Strategy.

**THEMATIC AREA:** 1. Legislative and Institutional Framework

**COMMITMENT TIMEFRAME:** The commitment has no designated timeframe. The strategy was introduced in May 2021; the implementation period is set for 2021-2023.

**COMMITMENT SOURCE:** N/A

### Current level of progress in commitment implementation

Fulfilled

X

Partially fulfilled

Not fulfilled/dropped

The Finnish government published its National Anti-Corruption strategy with an Action Plan for implementation in May 2021<sup>55</sup>. The policy document is a new strategy that did not previously exist, yet its conception dates to the creation of the National Anti-Corruption network in 2014, which was tasked with drafting the strategy. The network brought together different ministries, law enforcement entities, other public sector representatives such as municipal representatives, and Transparency International Finland.<sup>56</sup>

The first draft of the strategy was published in 2017, and the ministers responsible for the rule of law and internal security decided on the final strategy in 2019. In April 2020, a cross-ministry working group finalised the technical preparation of the strategy and action plan. Political commitment to the strategy was made in May 2021.<sup>57</sup>

Covering 2021-2023, the strategy is an extensive document that comprehensively addresses current challenges in the Finnish anti-corruption framework, as well as international recommendations by GRECO, the OECD, and others. It includes 77 action targets and the following focus points:

1. Reinforcement and clarification of the official structures for preventing and combatting corruption and improvement of cooperation between the parties involved.
2. Raised awareness of corruption.
3. Increased transparency.
4. Promotion of the exposure of corruption.

<sup>55</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

<sup>56</sup> Finnish government, Anti-corruption draft network anti-corruption strategy, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML\\_14\\_2017\\_Korruptio\\_strategia.pdf](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/79314/OMML_14_2017_Korruptio_strategia.pdf)

<sup>57</sup> Finnish government, Government Resolution on the National Anti-Corruption Strategy and Action Plan 2021-2023, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN\\_2021\\_68.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163398/VN_2021_68.pdf?sequence=1&isAllowed=y)

5. Examination of the functioning of anti-corruption legislation and the development of legislation.
6. Promotion of research related to corruption and its prevention.

With the drafting and publishing of this strategy, the commitment made at the IACC 2018 can be considered fulfilled.

## Recommendations

- Ensure the authorities have adequate resources to take up new responsibilities and implement the actions effectively and within the set timeframe, as most of the 77 proposed actions rely on regular and sufficient funding from the respective authorities.
- Evaluate the National Anti-Corruption Strategy and Action Plan in terms of outcomes and impacts on an action-by-action basis after a meaningful implementation period of no longer than three years. Carry out an initial assessment immediately after a particular action, such as anti-corruption training, takes place. Publish this evaluation on the government website both as an executive summary and in a more comprehensive format, including all details around the evaluation.
- Hold public consultations for each new policy measure proposed under the strategy, including independent civil society, academic and private-sector responses.
- Bring the Finnish experience of implementing this strategy, as well as the tools developed, into international collaboration, so other countries can learn from it and the Finnish government can learn from the experience of other countries.

**COMMITMENT 2: Facilitate anonymous/confidential reporting of suspected corruption, strengthen the capacity of authorities receiving reports of corruption to process the reports effectively and confidentially, reinforce cooperation between the authorities, and strengthen key structures for protecting whistleblowers.**

**THEMATIC AREA:** 1. Legislative and Institutional Framework

**COMMITMENT TIMEFRAME:** Expected to be implemented as part of the EU Directive in early 2022<sup>58</sup>

**COMMITMENT SOURCE:** GRECO recommendations<sup>59</sup>, EU Directive on Whistleblower Protection,<sup>60</sup> National Anti-Corruption Strategy

## Current level of progress in commitment implementation

Fulfilled

Partially fulfilled

X

Not fulfilled/dropped

<sup>58</sup> Finnish Parliament, National implementation of the Whistleblower Directive, [https://www.eduskunta.fi/FI/naineduskuntatoimii/kirjasto/aineistot/kotimainen\\_oikeus/LATI/Sivut/whistleblower-direktiivin-kansallinen-taytantonpano.aspx](https://www.eduskunta.fi/FI/naineduskuntatoimii/kirjasto/aineistot/kotimainen_oikeus/LATI/Sivut/whistleblower-direktiivin-kansallinen-taytantonpano.aspx)

<sup>59</sup> GRECO, Fifth Evaluation Round Compliance Report, Finland, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a0b0ca>

<sup>60</sup> European Union, Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the Protection of Persons who Report Breaches of Union Law, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32019L1937>

## Background Information:

This commitment responds directly to recommendations by GRECO in the fifth evaluation round in 2018, which highlight the shortcomings of reporting obligations and channels, and whistleblower protection at large.<sup>61</sup> These recommendations explicitly focused on "(i) establishing an obligation for police officers and border guards to report corruption; and (ii) strengthening the protection of whistleblowers in that respect". GRECO has highlighted the need for corruption reporting channels since its second evaluation round for Finland in 2003.<sup>62</sup>

When the Finnish government made this commitment at the IACC 2018, Finland did not have specific whistleblower protection legislation. Instead, the legislative protection of whistleblowers has been created through other legislation, such as the Trade Secrets Act (transposed from the 2017 EU Directive), providing limited measures to protect whistleblowers from retaliation and support reporting illicit behaviour.<sup>63</sup> To address this gap, the National Anti-Corruption Strategy 2021-2023 mentions under action 5.1.2 the implementation of the EU Whistleblower Directive. It also includes various activities supporting whistleblower protection, such as awareness raising, capacity building and cooperation between authorities.

The sub-actions of the commitment as operationalised in the National Action Plan are outlined below. These actions should be implemented in 2022-2023, with some having started in 2021.

## Monitoring:

### *2.1 Fully implement the EU Whistleblower Directive. Partially fulfilled*

*a) Set up anonymous and confidential reporting mechanisms in line with the standards for confidential reporting channels (Chapter II of the Directive). Not fulfilled*

There has been no progress in setting up anonymous or confidential reporting mechanisms, as the reporting channels will only become operational when the legislation is implemented. According to the Ministry of Justice (MoJ), it has only started to inform the obliged entities of their responsibilities to establish reporting channels, to provide them with sufficient time to prepare.<sup>64</sup>

*b) Establish protective measures for whistleblowers (Chapter IV). Partially fulfilled*

The EU institutions reached an agreement on the directive in 2018, since when EU Member States have been able to transpose the directive into national legislation. However, implementing the Directive in Finland is yet to be finalised. According to the Ministry of Justice, the Finnish government plans to submit the legislation to parliament in June 2022 for approval. The ministry closed public consultations on the bill in July 2021.<sup>65</sup>

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<sup>61</sup> GRECO, Fifth Round Evaluation Report, Finland, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680796d12>

<sup>62</sup> GRECO, Second Round Evaluation Report, Finland, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c5c99>

<sup>63</sup> Finlex, 595/2018 Trade Secrets Act, <https://www.finlex.fi/fi/laki/alkup/2018/20180595>

<sup>64</sup> Anonymous interview with Ministry of Justice representative by Transparency International Finland.

<sup>65</sup> Finnish Parliament, National implementation of the Whistleblower Directive, [https://www.eduskunta.fi/FI/naineduskuntatoimii/kirjasto/aineistot/kotimainen\\_oikeus/LATI/Sivut/whistleblower-direktiivin-kansallinen-taytantaonpano.aspx](https://www.eduskunta.fi/FI/naineduskuntatoimii/kirjasto/aineistot/kotimainen_oikeus/LATI/Sivut/whistleblower-direktiivin-kansallinen-taytantaonpano.aspx)

## 2.2 Organise training for those receiving and processing reports. *Partially fulfilled*

According to MoJ, it has provided preparatory training for the relevant reporting entities. (See Annex 3 for these training activities.) However, there is little publicly available information about this training, and it is unclear if it reached all relevant persons, who are receiving and processing reports.

## 2.3 Reinforce cooperation between the authorities. *Partially fulfilled*

a) *Set up an operational cooperation group to enhance the fight against corruption and improve operational cooperation between the authorities. Not fulfilled*

The MoJ could not provide detailed confirmation of such a group being established.

b) *Ministries appoint contact persons for the prevention and combatting of corruption, to draw attention to corruption issues within their own organisation. Fulfilled*

The ministries have appointed their contact persons for the prevention and combatting of corruption. This is confirmed by the evidence provided in Annex 4, figure 2.3.1.

As the government implemented only some of the promised actions to implement the EU Directive and improve whistleblower protection, this commitment is considered **partially fulfilled** overall.

## Challenges to effective commitment implementation

The Finnish government announced in December 2021 that there was a delay in the implementation of the directive.<sup>66</sup> According to the Ministry of Justice, this was due to the large scale of the proposed EU legislation and the extent of the responses to the public consultation.<sup>67</sup> However, the process of preparing the legislation can also be considered considerably late, as it was started in April 2018. It also needs to be noted that eight countries had managed to adopt the legislation by April 2022 (Croatia, Cyprus, Denmark, France, Lithuania, Latvia, Malta, Portugal, Sweden), according to the EU Whistleblowing monitor.<sup>68</sup> However, some of these countries already had existing legislation on whistleblower legislation to built on.<sup>69</sup>

The deadline for transposition of the directive to national legislation was the end of 2021. However, beyond Finland, several other EU Member States have delayed transposition. The EU Whistleblowing Monitor highlighted that there had been three delays in the process of

<sup>66</sup> Ministry of Justice Finland, "The government's proposal on whistleblower protection is delayed", <https://valtioneuvosto.fi/-/1410853/hallituksen-esitys-ilmoittajansuojasta-myohasty>

<sup>67</sup> Ministry of Justice Finland, "The government's proposal on whistleblower protection is delayed", <https://oikeusministerio.fi/-/hallituksen-esitys-ilmoittajansuojasta-myohasty>

<sup>68</sup> EU Whistleblowing Monitor, <https://www.whistleblowingmonitor.eu/>

<sup>69</sup> European Environmental Bureau, Whistleblowing Law in 2021, a quick guide, <https://eeb.org/wp-content/uploads/2021/04/Whistleblowing-law-in-2021-a-quick-guide-3.pdf>

implementing the national legislation in Finland.<sup>70</sup> This report does not cover the latest delay, announced in December 2021.<sup>71</sup>

## Opportunities to accelerate commitment implementation

The simultaneous experience of implementing the directive in other EU states will provide an opportunity to learn from the best practices in other countries. However, due to the delays in several countries, these opportunities may be limited to the eight early adopters. In addition, the European Commission has an expert group to support its Member States in implementing the directive in which Finland has been participating already during the earlier part of the legislative process. However, it is unclear if it intends to meet further after July 2021, when the last meeting was held.<sup>72</sup>

The government can also use the EU Expert Working Groups on Protecting Persons who Report Breaches of Union Law<sup>73</sup> to exchange best practices in directive implementation. The OECD analysis on whistleblower protection regimes<sup>74</sup> can also be used to seek best practice outside EU countries and beyond the Directive.

## Recommendations

- Go beyond the minimum standards set by the EU Directive when shaping Finnish whistleblower protection legislation and consider the Council of Europe whistleblowing recommendations, which were made in 2009.<sup>75</sup>
- Utilise exchange of experiences and assess the legislation's effectiveness in other countries implementing the directive (Croatia, Cyprus, Denmark, France, Lithuania, Latvia, Malta, Portugal, Sweden), either bilaterally or through the EU or Council of Europe rapporteur group on justice.
- Once the government has implemented the directive, it should communicate the new standards to all actors affected, set up a control mechanism and sanction non-compliance.
- Provide advice and support for technical solutions to actors implementing reporting channels. Ensure these meet standards on confidentiality and anonymity, including from the perspective of IT systems security.
- Ensure the reporting mechanisms include a cross-border angle, to enable reporting corruption that occurs outside Finland.

<sup>70</sup> EU Whistleblowing Monitor, Finland, <https://www.whistleblowingmonitor.eu/country/finland>

<sup>71</sup> Ministry of Justice Finland, "The government's proposal on whistleblower protection is delayed", <https://valtioneuvosto.fi/-/1410853/hallituksen-esitys-ilmoittajansuojasta-myohasty>

<sup>72</sup> European Commission, Commission Expert Group on the Directive (EU) 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (E03709), <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3709>

<sup>73</sup> European Commission, Commission Expert Group on the Directive (EU) 2019/1937 on the Protection of Persons Who Report Breaches of Union Law (E03709), <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&groupID=3709>

<sup>74</sup> OECD, Committing to Effective Whistleblower Protection, <https://www.oecd.org/corruption-integrity/reports/committing-to-effective-whistleblower-protection-9789264252639-en.html>

<sup>75</sup> Secretariat of GRECO, "The protection of whistleblowers in the light of GRECO's work", <https://www.batory.org.pl/doc/Whistleblowing%20mechanisms%20REV2%20for%20Batory%20Foundation%20Conf%20of%2030March09.pdf>

**COMMITMENT 3: Ministry for Foreign Affairs will establish a comprehensive risk management policy in line with the recommendations of the OECD Development Assistance Committee Peer Review in 2017, also taking stock of the Committee recommendations on corruption risk management.**

**THEMATIC AREA:** 1. Legislative and Institutional Framework; 2. Public Integrity

**COMMITMENT TIMEFRAME:** In 2021 (as per national strategy, 4.4.1.)

**COMMITMENT SOURCE:** National Anti-Corruption Strategy

#### Current level of progress in commitment implementation

Fulfilled

Partially fulfilled

X

Not fulfilled/dropped

#### Background Information:

Before the IACC commitment, the Ministry for Foreign Affairs did not have a comprehensive risk management policy, but instead had general risk management measures in place as part of the earlier Results-Based Management approach. The OECD's Development Assistance Committee Peer Review of 2017 highlighted the need for a risk management policy.<sup>76</sup>

Preparing the risk management policy started before the Anti-Corruption Strategy was published, as reflected for the first time in the ministry's development policy report of 2018.<sup>77</sup> The process was not mentioned in the 2015 report and was completed in 2020.

#### Monitoring:

The risk management policy has been publicly available since late 2021.<sup>78</sup> It is accompanied by an annex specifying the guidelines for risk management, including from an analysis and detection perspective.<sup>79</sup>

The risk management policy actions match the **OECD recommendation**<sup>80</sup> in the following areas:

<sup>76</sup> OECD, The Development Assistance Committee's main findings and recommendations – Extract from OECD Development Co-operation Peer Reviews, Finland 2017, <https://www.oecd.org/dac/peer-reviews/DAC-Peer%20Review-Finland-2017-MFR.pdf>

<sup>77</sup> Ministry of Foreign Affairs Finland, Finland's Development Policy Results Report 2018, <https://um.fi/documents/35732/0/UM+KPR+2018+ENG+WEB.pdf/944cf817-9d4a-43ca-07a7-2aebd6053801>

<sup>78</sup> Ministry of Foreign Affairs Finland, Development Cooperation Risk Management Policy, <https://um.fi/documents/35732/0/Kehitysyhteisty%C3%B6n+riskienhallintapolitiikka+2021.pdf/d5f95615-7ff9-cbe0-5f15-2d5ad92fa31f?t=1639135339997>

<sup>79</sup> Ministry of Foreign Affairs Finland, Guidance on Risk Assessment, Management and Control: Drawing Up a Risk Management Plan, <https://um.fi/documents/35732/0/LIITE+2+Riskienhallintapolitiikka+-+ohjeistus+riskien+arviointiin.pdf/7509f5f7-2c66-a626-4afe-c28adc5e9f06?t=1639135370019>

<sup>80</sup> OECD, OECD Development Co-operation Peer Reviews Finland 2017, <https://www.eduskunta.fi/FI/vaski/Liiteasiakirja/Documents/EDK-2018-AK-171068.pdf>

*3.1 Develop a comprehensive overview of Finnish activities in long-term partner countries. Improving the analysis of risks, to reflect the actual state of programmes*

The Ministry for Foreign Affairs' (MFA) risk-management policy includes the evaluation of risks of existing programmes and introduces ex-post impact assessment and programme evaluation, to improve the analysis of risks and identify how it addresses programmes on the ground.<sup>81</sup>

*3.2 Ensure that risk management actions are built into programme design and implemented, and that risks are regularly monitored.*

*a) Inclusion of methods to adapt to the risk environment*

The MFA includes a set of methods for adapting to the risk environment. This methodology is based on high-level risk management principles with a detailed action plan. It is built on the following pillars:

1. Risk management guidelines and operating model of the Ministry of Economy
2. Working order and security principles of the Ministry for Foreign Affairs
3. Development cooperation principles, strategic solutions, division of labour and management model
4. Strategic risk management, contractual models, and preparation of actions

Operative risk management on the intervention level<sup>82</sup>

*b) Guidance on risk mitigation at overall country-programme level*

The MFA provides new risk mitigation and management guidelines at country-programme level within the new policy.<sup>83</sup>

*c) Increase the capacity and ability to conduct interventions*

Besides the regular anti-corruption training that the MFA provides to staff member in its basic training (333 staff members annually), the total number of staff receiving the training has increased in the past years. Almost 750 staff members received the training in 2019, while 841 were trained in 2020. The number for 2021 was as high as 988 staff members. This includes training via Risk Management and Quality Assurance workshops. The Ministry for Foreign Affairs provided an internal document confirming the detailed staff participation figures for the annual development cooperation and policy training. However, it did not allow the training statistics to be published as an Annex to the IACC Monitor Country Report.<sup>84</sup> Therefore, the commitment can only be considered partially fulfilled according to the methodological criteria of transparency for this monitoring report.

Overall, this commitment is considered **partially fulfilled**.

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<sup>81</sup> Ministry of Foreign Affairs Finland, Development Cooperation Risk Management Policy.

<sup>82</sup> Ministry of Foreign Affairs Finland, Development Cooperation Risk Management Policy.

<sup>83</sup> Ministry of Foreign Affairs Finland, Development Cooperation Risk Management Policy.

<sup>84</sup> Email exchange with the Finnish Ministry for Foreign Affairs.

## Challenges to effective commitment implementation

The main challenge that the Ministry identified in its financial report of 2020 regarding risk management was the adequacy of resources, in terms of both personnel and skills. The report further mentions the functionality of IT systems, information security, health and safety, and real estate management as specific risk challenges. However, the ministry concluded that risk management was already of a good standard before adopting the new risk management policy.<sup>85</sup> Other reports, such as the annual report on development cooperation, also considered risk management efficient before 2021.<sup>86</sup>

## Opportunities to accelerate commitment implementation

As the OECD standards on development cooperation exposed prior vulnerabilities in Finnish risk management, the OECD could be a source of international best practices, and opportunities to evaluate Finnish risk management could be used to develop it further. For example, through the Development Assistance Committee (DAC).

## Recommendations

- Train all staff of the Ministry for Foreign Affairs in the new policy.
- Evaluate the policy internally every two years and hold public consultations with civil society. This evaluation can be built on the OECD peer-review evaluation framework<sup>87</sup> and similar frameworks developed in other ministries, such as the current risk management framework of the Ministry of Finance.<sup>88</sup>
- Bring lessons learned to the private sector to provide best practices for detecting and addressing corruption issues, especially when private partners are involved in development programmes or similar activities.
- Included the risk management policy in other programmes not managed directly by the Ministry for Foreign Affairs, such as programmes and projects run by NGOs receiving ministry funding.

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<sup>85</sup> Ministry of Foreign Affairs Finland, Financial statements of the Ministry of Foreign Affairs 2020, <https://um.fi/documents/35732/0/TP-2020-FINAL.pdf/21e85aac-e7f3-bbe5-0d42-7df27936dd77?t=1615819122192>

<sup>86</sup> Ministry of Foreign Affairs Finland, Report on Development Policy Across Parliamentary Terms, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163218/VN\\_2021\\_29.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163218/VN_2021_29.pdf?sequence=1&isAllowed=y)

<sup>87</sup> OECD, The DAC's main findings and recommendations, extract from: OECD Development Co-operation Peer Reviews Finland 2017, <https://www.oecd.org/dac/peer-reviews/DAC-Peer%20Review-Finland-2017-MFR.pdf>

<sup>88</sup> Ministry of Foreign Affairs Finland, Government-level risk management evolution: Final report of the working group, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163184/VM\\_2021\\_28.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163184/VM_2021_28.pdf?sequence=1&isAllowed=y)

**COMMITMENT 5: In the Addis Tax Initiative we have committed to doubling Finland's support for strengthening developing countries' domestic resource mobilisation by 2020.**

**THEMATIC AREA:** 6. International Cooperation and Support

**COMMITMENT TIMEFRAME:** The deadline to reach the funding level was set at 2020.

**COMMITMENT SOURCE:** The Addis Tax Initiative Declaration

#### Current level of progress in commitment implementation

Fulfilled

Partially fulfilled

Not fulfilled/dropped

X

The Addis Tax Initiative is a multi-stakeholder partnership that aims to foster collective action to improve tax systems considering recognised gaps in development finance.<sup>89</sup> The initiative's actions are organised under the Finnish Tax and Development Action Programme (TDAP).<sup>90</sup>

Finland joined the Addis Tax Initiative in 2015 with \$4.538 million (roughly €4.3 million) of funding. The aim of the commitment was to double this funding by 2020, to the level of \$9.076 million (roughly €8.6 million). This target was not met, as the development aid roughly remained at the level for 2015 or even below. In 2018 the funding was only \$1.834 million (€1.7 million) and in 2019 it was only \$4.835 (€4.5 million).<sup>91</sup> This was due to cuts in the development aid budget under the previous Finnish government of 2015-2019. In 2020, the Addis Tax Initiative has not published detailed funding data on country contributions yet.<sup>92</sup> Therefore, the commitment is currently not fulfilled. However, the Ministry of Foreign Affairs' latest Taxation for development Action Programme 2020–2023 report committed to reaching the level of €8.6 million by 2022.<sup>93</sup>

#### Challenges to effective commitment implementation

The delay in reaching the funding level shows that budgetary commitment to development finance depends on the government's political will. The budget cut was part of the more comprehensive austerity policy of Juha Sipilä's centre-right government, which lowered development funding from the 2014 level of €1.171 billion to €817m by 2016, cutting almost a third of the overall development funding. Some areas, such as multilateral partnerships, lost

<sup>89</sup> Addis Tax Initiative, Commitments and Principles, <https://www.addistaxinitiative.net/commitments-principles>

<sup>90</sup> Ministry of Foreign Affairs, Finland, Taxation for Development: Finland's Action Programme 2020–2023, [https://um.fi/documents/35732/0/Finland\\_Tax4D\\_Action\\_program\\_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102](https://um.fi/documents/35732/0/Finland_Tax4D_Action_program_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102)

<sup>91</sup> Tax Justice Network, Nordic aid for mobilising tax revenues for development and reducing inequality, <https://taxjustice.no/assets/documents/Nordic-aid-for-tax-policy-brief-dec2020-v2.pdf>

<sup>92</sup> Addis Tax Initiative, Finland, <https://www.addistaxinitiative.net/profile/finland>

<sup>93</sup> Ministry of Foreign Affairs Finland, Taxation for Development: Finland's Action Programme 2020–2023, [https://um.fi/documents/35732/0/Finland\\_Tax4D\\_Action\\_program\\_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102](https://um.fi/documents/35732/0/Finland_Tax4D_Action_program_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102)

nearly 60 per cent of funding between 2014 and 2016.<sup>94</sup> The unpredictability of political changes makes it difficult to set long-term funding targets.

## Opportunities to accelerate commitment implementation

The centre-left government led by Sanna Marin has raised development funding and aims to reach the previous funding levels set by the commitment. Financing for the Addis Tax Initiative is expected to meet the initial target by 2022.<sup>95</sup> This increase in funding also provides opportunities to target the financing of new projects, following the OECD Development Co-operation Directorate selection criteria. Coordination of funding with other OECD and Addis Tax Initiative countries will be essential to prevent overlaps.

## Recommendations

- Ensure that the funding models offer future predictability, avoiding political backtracking on their objectives – e.g., by providing a multi-year funding framework.
- Introduce the risk-management measures outlined in the MFA's new risk-management policy to publicly funded projects with partner countries.
- Regularly assess the effectiveness of projects funded under the Addis Tax Initiative. The previous evaluation took place in 2021 and found that Finland's support primarily targeted the bureaucratic level and technical capacity building, while shying away from more sensitive discussions, such as addressing ineffective taxation of the wealthy in the countries that Finnish development policy supports.<sup>96</sup> Future actions should address these gaps.
- Create synergies with other EU countries and national programmes with similar objectives of improving tax systems and tackling illicit financial flows. Seek collaborative funding opportunities or draw on lessons learned from other projects and programmes to identify successful models for the funding.

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<sup>94</sup> Ministry of Foreign Affairs Finland, Table 1. Development cooperation appropriations and payments 1989-2020, <https://um.fi/documents/35732/0/Kehitysyhteisty%C3%B6n+m%C3%A4%C3%A4r%C3%A4rahat+ja+maksatukset+1989-2020.pdf/5cade8d2-7666-72cc-94c6-a27fca2c14ea?t=1627554380062>

<sup>95</sup> Ministry of Foreign Affairs Finland, Taxation for Development: Finland's Action Programme 2020–2023, [https://um.fi/documents/35732/0/Finland\\_Tax4D\\_Action\\_program\\_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102?t=1591620474451](https://um.fi/documents/35732/0/Finland_Tax4D_Action_program_050620.pdf/cf6f8dae-434c-96e5-be1c-b9e79e0dc102?t=1591620474451)

<sup>96</sup> Ministry for Foreign Affairs, Evaluation of Economic Development, Job Creation and Livelihoods, Volume 1.2 Annexes, [https://um.fi/documents/384998/0/UM\\_Evaluation\\_on\\_Economic\\_devel\\_Job\\_Creation\\_and\\_livelihoods\\_Vol1\\_2\\_Annexes+%283%29.pdf/b5cf3c6e-e740-52dc-cfad-777e90a12344?t=1639394117971](https://um.fi/documents/384998/0/UM_Evaluation_on_Economic_devel_Job_Creation_and_livelihoods_Vol1_2_Annexes+%283%29.pdf/b5cf3c6e-e740-52dc-cfad-777e90a12344?t=1639394117971)

**COMMITMENT 7: Enhance monitoring of procurement and expanding procurement units' access to information as well as by increasing procurement units' opportunities to intervene in cases of corruption they detect.**

**THEMATIC AREA:** 3. Fiscal Integrity

**COMMITMENT TIMEFRAME:** Several initiatives between 2020 and 2023 (see National Strategy, actions 2.2.1., 3.3., 4.2.1)

**COMMITMENT SOURCE:** National Anti-Corruption Strategy, Open Government Partnership recommendations, GRECO recommendations

#### Current level of progress in commitment implementation

Fulfilled	X
Partially fulfilled	
Not fulfilled/dropped	

#### Background Information:

The commitment relates directly to the 2017 GRECO recommendations<sup>97</sup> and the findings of the Open Government Partnership IRM (Independent Reporting Mechanism) Evaluation of 2019.<sup>98</sup> The GRECO recommendations focused on using financial reporting, such as avoiding conflicts of interest and making public procurement data accessible online. In addition, the OGP evaluation emphasised the need to make public procurement data openly accessible.

#### Monitoring:

The National Anti-Corruption Strategy outlines several actions that directly respond to these recommendations, enhancing public procurement, expanding procurement units' access to information, and increasing opportunities to intervene when corruption is detected. The Action Plan against the Shadow Economy and Economic Crime for 2016-2020<sup>99</sup> also included measures to create public access to procurement data. The National Anti-Corruption Strategy includes the following actions:

*7.1 Organise thematic training on the risks of corruption for officials, internal auditors and elected officials engaging in procurement. Fulfilled*

As part of the national strategy countering the grey economy and financial crime, the Ministry of Justice organised targeted and tailored training for high-risk sectors during 2021 and plans to continue this in 2022. Risk sectors are public procurement, political decision-making – especially

<sup>97</sup> OECD, Fifth Evaluation Round Evaluation Report Finland, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680796d12>

<sup>98</sup> OGP, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023,

[https://www.opengovpartnership.org/wp-content/uploads/2020/11/Finland\\_Design\\_Report\\_2019-2023\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2020/11/Finland_Design_Report_2019-2023_EN.pdf)

<sup>99</sup> Grey Economy and Economic Crime, Action Plan against the Shadow Economy and Economic Crime for 2016–2020, <https://www.vero.fi/en/grey-economy-crime/prevention/torijuntaohjelma/action-plan-against-the-shadow-economy-and-economic-crime-for-20162020/>

at local level – and the building sector. The Ministry of Justice provided a list of training given to law enforcement, prosecutors, court staff and FIUs (Financial Intelligence Unit) included in Annex 6.

### *7.2 Expanding procurement units' access to information. Fulfilled*

#### *a) Examine means of promoting access to information on direct procurements. Fulfilled*

The National Competition and Consumer Authority report examined ways to promote access to information on direct procurements, providing recommendations on measures for better access to information.<sup>100</sup>

#### *b) Investigate means to improve access to information for contracting entities in connection with procurements. Fulfilled*

The Finnish tax authorities carried out a project, connecting contracting entities and financial supervisors to the FCInet system, which provides a platform to match investigative data via information exchange,<sup>101</sup> publishing a checklist for procurement units,<sup>102</sup> and creating a public website to investigate procurement data.<sup>103</sup>

#### *c) Investigate the possibility of requiring declarations of private interests from persons involved in the preparation of procurements, or other means of preventing conflicts of interest. Fulfilled*

The National Competition and Consumer Authority report examined conflict of interest risks in public procurement. It provided three critical recommendations on measures to address potential issues: (a) introduce policies that do not allow conflicts of interest when selecting civil servants or allocating decision-making roles (b) ensure all organisations in the public sector have guidance and reporting channels to allow anonymous reporting of conflicts of interest or other illicit behaviour, and (c) nominate internal auditing or another similar actor to receive these reports, protect the whistleblower and initiate investigations.<sup>104</sup>

### *7.3 Improve the competence of persons working with public procurement in procurement processes and procurement legislation. Fulfilled*

Measures under the Action Plan for Tackling the Grey Economy and Economic Crime, such as the project to enhance corruption detection by 2019, have improved the competencies of people working in public procurement.<sup>105</sup> In addition, the checklist for procurement personnel was

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<sup>100</sup> Finnish Competition and Consumer Authority, Grey Economy and Procurement, <https://www.kkv.fi/uploads/sites/2/2021/12/harmaa-talous-ja-hankinnat-2019.pdf>

<sup>101</sup> FCInet is a decentralised information exchange system for exchanging data to fight financial crime cross borders, <https://www.fcinet.org/>

<sup>102</sup> About current competition (Expert Writings on Competition and Market Functioning), How to prevent cartels in public procurement? Checklist for contracting entities, <https://ajankohtaistakilpailusta.fi/2018/05/15/miten-ehkaista-kartelleja-julkisissa-hankinnoissa-muistilista-hankintayksikoille/>

<sup>103</sup> Investigate Procurement, <https://www.tutkihankintoja.fi/>

<sup>104</sup> Finnish Competition and Consumer Authority, Grey Economy and Procurement, <https://www.kkv.fi/uploads/sites/2/2021/12/harmaa-talous-ja-hankinnat-2019.pdf>

<sup>105</sup> Finnish Parliament, The Grey Economy and Financial Crime Monitoring of the Control Action Programme, <https://www.eduskunta.fi/FI/vaski/JulkaisuMetatieto/Documents/EDK-2019-AK-270382.pdf>

accompanied by the 2021 Hankinta-Suomi initiative guidelines for codes of conduct and a self-assessment form.<sup>106</sup> Public procurement authorities have also received increased training outlined in 7.1.

Overall, therefore, we consider this commitment **fulfilled**.

## Recommendations

- Tailor training material to new sources of information (such as beneficial ownership registers)
- Enhance the automated detection of conflicts of interest by connecting existing registers – such as company, land, and beneficial ownership registers – cross-referencing these with declarations of interests and ensuring that the quality of each register’s data is reliable.
- Follow the recommendations made by the KORSI-project<sup>107</sup> and GRECO<sup>108</sup> for the cross-use of public registers that hold information on public procurement.
- Open public procurement data to the public to attract independent scrutiny by civil society and media, while also supporting citizens’ trust in public procurement. While Finland and the Ministry of Finance have increased the amount of available data, the level of detail and data usability need to increase further.<sup>109</sup>
- Enhance the transparency and availability of detailed public procurement data by consulting open data users and taking their experiences into account.

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<sup>106</sup> Ministry of Finance Finland, Procurement Finland – Public Procurement More Impressive, <https://vm.fi/hankinta-suomi>;

Hansel Oy, Karolina Lehto and Liisa Lehtomäki, Annex on Minimum Liability Obligations (Code of Conduct) and its use in Public Procurement,

[https://vm.fi/documents/10623/102149009/Vastuullisuuden+v%C3%A4himm%C3%A4isvelvoitteet+-+ohjeistus+word.pdf/62f18bf0-3bad-8941-f515-](https://vm.fi/documents/10623/102149009/Vastuullisuuden+v%C3%A4himm%C3%A4isvelvoitteet+-+ohjeistus+word.pdf/62f18bf0-3bad-8941-f515-d3491df40558/Vastuullisuuden+v%C3%A4himm%C3%A4isvelvoitteet+-+ohjeistus+word.pdf?t=1639573503096)

[d3491df40558/Vastuullisuuden+v%C3%A4himm%C3%A4isvelvoitteet+-+ohjeistus+word.pdf?t=1639573503096](https://vm.fi/documents/10623/102149009/Vastuullisuuden+v%C3%A4himm%C3%A4isvelvoitteet+-+ohjeistus+word.pdf?t=1639573503096)

<sup>107</sup> KORSI project, Immeasurable corruption? Corruption Monitoring Indicators (KORSI) Project and its Main Results, [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162521/VNTEAS\\_2020\\_44.pdf](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162521/VNTEAS_2020_44.pdf), 22-27.

<sup>108</sup> OECD, Fifth Evaluation Round Evaluation Report Finland, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680796d12>

<sup>109</sup> OGP, Independent Reporting Mechanism (IRM): Finland Design Report 2019–2023,

[https://www.opengovpartnership.org/wp-content/uploads/2020/11/Finland\\_Design\\_Report\\_2019-2023\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2020/11/Finland_Design_Report_2019-2023_EN.pdf)

**COMMITMENT 8: Promote detection of corruption offences and imposition of criminal liability through targeted education and by preparing corruption identification guidelines for all authorities involved in the process of combatting crime.**

**THEMATIC AREA:** 5. Security and Law Enforcement

**COMMITMENT TIMEFRAME:** Several measures are taking place in 2021-2023 (see National Strategy, actions 1.1.4 and 2.2.2.)

**COMMITMENT SOURCE:** National Anti-Corruption Strategy, GRECO recommendations, OECD recommendations

Current level of progress in commitment implementation	
Fulfilled	X
Partially fulfilled	
Not fulfilled/dropped	

**Background Information:**

This commitment relates directly to the recommendations of the 2017 OECD Convention on Combatting Bribery report, which emphasise Finland's need to further develop the ability to detect bribery of Financial Intelligence Unit (FIU) officials, accountants, auditors, and civil servants.<sup>110</sup> It was later operationalised in the National Action Plan with the following action points:

**Monitoring:**

*8.1 Targeted education: Give specialised, and when necessary, joint training sessions, on corruption to special prosecutors, police officers, staff at the courts of law and the Financial Intelligence Unit. Fulfilled*

The Ministry of Justice provided a list of training provided to law enforcement, prosecutors, court staff and FIUs included in Annex 6.

*8.2 Preparing corruption identification guidelines for all authorities involved in the process of combatting crime (special prosecutors, police officers, staff at the courts of law and the Financial Intelligence Unit). Fulfilled*

Implementation of the National Strategy for Tackling the Shadow Economy and Economic Crime for 2016–2020 included a corruption-related priority project. Its purpose was to promote the detection of corruption offences and impose criminal liability through targeted education by preparing corruption identification guidelines for all authorities involved in combatting crime. These guidelines provide detailed information on the distinct roles of prosecutors, the police, courts and

<sup>110</sup> OECD, Implementing the OECD Anti-Bribery Convention Phase 4 Report: Finland, <https://www.oecd.org/corruption/anti-bribery/Finland-Phase-4-Report-ENG.pdf>

FIUs in corruption investigation and prevention, among other actors such as customs and tax authorities.<sup>111</sup>

## Recommendations

- Develop training materials for new forms of corruption. This includes corruption cases that use new technologies, such as digital exchange of valuable goods and services, or have other high-risk elements, such as cross-border transactions requiring international investigation tools and databases, including foreign information registers.
- Provide up-to-date investigative tools and resources, such as digital data analytics and fintech tools, or new registries set to identify beneficial owners, so that law enforcement authorities can use the available material to identify and investigate corruption cases.
- Conduct research and evaluations to identify upcoming risk scenarios and new tools to detect corruption.
- Provide up-to-date training material considering recent policy developments, such as the introduction of beneficial ownership registers in the EU.
- Collaborate with the private sector, as the gatekeepers of money laundering, for investigating and detecting corruption. Organise joint training exercises between private-sector compliance personnel and law enforcement personnel.<sup>112</sup>

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<sup>111</sup> Ministry of Justice Finland, A Guide to Improving the Prevention, Identification and Detection of Corruption, <https://docplayer.fi/153233305-Opas-korruption-ennaltaehkaisyyn-tunnistamiseen-ja-paljastamisen-tehostamiseen.html>

<sup>112</sup> European Commission, Preventing Money Laundering and Terrorist Financing – EU Rules on Public-Private Partnerships (PPPs), [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13152-Public-private-partnerships-in-the-area-of-anti-money-laundering-and-counter-terrorist-financing/public-consultation\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13152-Public-private-partnerships-in-the-area-of-anti-money-laundering-and-counter-terrorist-financing/public-consultation_en)

# RECOMMENDATIONS

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Implementation of the Finnish IACC commitments is significantly delayed. While most of the commitments also integrate international recommendations, it is not clear whether all recommendations were systematically considered, as they were not explicitly mentioned in the IACC commitments. This includes systemic or institutional corruption risks, such as so-called “old-boy networks” and nepotism, common in Finland. Based on a comprehensive assessment in this report, the Finnish government should implement the following measures:

## Support implementation of the National Anti-Corruption Strategy

- Provide publicly available ex-post assessment of the anti-corruption strategy to identify any gaps in implementation or potential opportunities to improve the anti-corruption efforts with the next strategy.
- Ensure the comprehensive implementation of the EU Whistleblower Directive. This includes supporting whistleblowers socially and economically and collaborating with social partners such as employer and employee representatives to ensure that reporting channels meet the necessary standards and employees are aware that they exist.
- Continue to assess corruption risks at national, regional, and local levels, especially in relation to the actions of the National Anti-Corruption Strategy. While most of the National Anti-Corruption Strategy measures tackle conflicts of interest in public decision-making and public procurement at the federal level, the strategy lacks such measures for the local level, where most investigations occur.<sup>113</sup>

## Close existing gaps in the anti-corruption framework

- Implement the planned lobbying transparency register in Finland using Transparency International’s recommendations on scope, usability, and user needs.<sup>114</sup> The register should provide transparent information on meetings between lobbyists and Finnish decision-makers. It is due to be published by the Ministry of Justice in 2023.<sup>115</sup>

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<sup>113</sup> Finnish Competition and Consumer Authority, Public procurement control results reporting 2020, <https://www.kkv.fi/uploads/sites/2/2021/12/julkisten-hankintojen-valvonnan-tulosten-raportointi-2020.pdf>

<sup>114</sup> Transparency International Finland, Request for an opinion from the Parliamentary Steering Group and the Expert Working Group report: a draft government proposal for a transparency register law, [https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/94d5a7b4-8608-4453-8e82-cb2ce2ece972/LAUSUNTO\\_20220131183805.PDF](https://api.hankeikkuna.fi/asiakirjat/7364026e-4e68-46ef-b06a-caa53c7549e0/94d5a7b4-8608-4453-8e82-cb2ce2ece972/LAUSUNTO_20220131183805.PDF)

<sup>115</sup> Ministry of Justice Finland, National Democracy Program 2025: interim report and follow-up, [https://api.hankeikkuna.fi/asiakirjat/b90db14e-6790-41d1-82bb-056437530015/4453cc6e-9f6d-4289-b004-a54d08268394/KIRJE\\_20211027102545.PDF](https://api.hankeikkuna.fi/asiakirjat/b90db14e-6790-41d1-82bb-056437530015/4453cc6e-9f6d-4289-b004-a54d08268394/KIRJE_20211027102545.PDF)

- Complement the register with new lobbying regulations to set binding rules for different interest groups accessing decision-makers. Lobbying currently remains largely unregulated.
- Support Finnish companies operating in high corruption-risk environments to tackle illicit financial flows. Raise risk awareness and provide necessary tools and access to databases for the Ministry of Foreign Affairs' private partners, to enable more in-depth due diligence, especially in the scope of publicly funded projects, but also supporting the corruption awareness of Finnish companies operating in high-risk environments, via, for example, trade advisory services such as Team Finland.
- Make beneficial ownership registers fully public and ensure that all data is machine-readable and added to the government's Open Data Portal (as with any other datasets). Make using these tools to detect corruption part of targeted training.

**Improve the formulation and planning of anti-corruption commitments to link them with other anti-corruption strategies**

- Coordinate commitments of different ministries and publish them jointly.
- Identify a specific policy area or anti-corruption mechanism and outline concrete actions on how the government aims to progress in this area. Avoid vague and non-committal language, as it does not allow for proper civil society monitoring.

# ANNEX 1: LIST OF INTERVIEWEES

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**Persons interviewed during the commitment monitoring  
– Online via video call, 18.10.-13.12.2021**

	<b>Position</b>	<b>Organisation</b>
1	Senior Specialist	Ministry of Justice
2	Senior Advisor	Ministry for Foreign Affairs
3	Development Councillor	Ministry of Justice
4		
5		
6		
7		
8		
9		
10		

# ANNEX 2: STAKEHOLDERS CONSULTED

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**Persons engaged during consultation on monitoring findings  
– Via email, 15.5.-15.7.2022**

	<b>Position</b>	<b>Organisation</b>
1	Senior Specialist	Ministry of Justice
2	Senior Advisor	Ministry for Foreign Affairs
3		
4		
5		
6		
7		
8		
9		
10		

# ANNEX 3: EVIDENCE COMMITMENT 2.2

## Commitment 2.2 Organise training for those receiving and processing reports

Event / Training	Audience	Content of the training	Date	Evidence
<b>Training day of the auditors of the public sector</b>	Public sector auditors	Whistleblower Directive transposition	19.01.2021	No public evidence was found. The Ministry of Justice provided agenda (Figure 2.2.1) of the event for the research, which is not publicly available.
<b>MoJ - MEAE Whistleblowing directive -info</b>	Ministerial level civil servants	Whistleblower Directive transposition	10.05.2021	No public evidence was found. The Ministry of Justice provided an invite (Figure 2.2.2) of the event, which is not publicly available
<b>Whistleblower – channels for state officials</b>	Ministerial level civil servants	Whistleblower Directive transposition	07.06.2021	The MoJ provided the agenda (Figure 2.2.3) of the event, which is not publicly available
<b>JUTTA (Auditors working in public sector) 2021 Seminar</b>	Public sector auditors	Whistleblower Directive transposition	06.10.2021	No public evidence was found. The Ministry of Justice provided agenda (Figure 2.2.4) of the event for the research, which is not publicly available.
<b>Finnish Internal Auditors IIA 60-year annual seminar</b>	Internal auditors	Whistleblower Directive transposition	03.11.2021	Event description on IIA website: <a href="https://theiia.fi/magazines/marraskuu-1-2021-ei-korruptiolle/">https://theiia.fi/magazines/marraskuu-1-2021-ei-korruptiolle/</a>

## Figure 2.2.1

Julkishallinnon ajankohtaispäivä 2021

Aikataulu: 19.1.2021:

8.15 - 8.45 - 30 min	Aamukahvi
8.45 - 9.00 - 15 min (sisäiset tarkastajat ry)	Päivän esittely ja aiheet / Kaarina Sinersalo toiminnanjohtaja IIA Finland
9.00 - 9.45 - 45 min +5	Whistleblowing -direktiivin kansallisen täytäntöönpanon tilanne / OM
9.45-10.00 - 10-15 min	Kahvitauko
10.00 - 10.50 - 45 min + 5	Katsaus korruptionvastaisen strategian valmisteluun /OM
10.50 - 11.40 - 45 min +5	Mitä virkamiesetikalla saralla on tapahtunut valtionhallinnossa / VM
11.40-12.40 -60 min	Lounas
12.40 - 13.30 - 45 min+5	Vastuullisuusraportointi kuntasektorilla/Kuntaliitto
13.30 - 14.20- 45 min +5	Uudet ohjeet vastuullisuusraportoinnista valtiolla/Valtiokonttori
14.20-14.40 – 20 min	Kahvitauko
14.40- 15.20 -30 min+10	Kansallinen julkisten hankintojen strategia 2020/VM + Suomen Kuntaliitto
15.20-16.00 – 30 min+10	Hankintojen kontrollit (valtiolla)/Valtiokonttori
16.00-16.15	Päivän päätös/Kaarina Sinersalo

## Figure 2.2.2



28.4.2021

### KUTSU INFO- JA KESKUSTELUTILAISUUTEEN EU:N ILMOITTAJANSUOJELUDIREKTIIVIN KANSALLISESTA TÄYTÄNTÖÖNPANOSTA

Euroopan unionin oikeuden rikkomisesta ilmoittavien henkilöiden suojelusta annetun direktiivi on tullut voimaan 16.12.2019. Se tulee panna kansallisesti täytäntöön viimeistään 17.12.2021 mennessä. Oikeusministeriö on perustanut työryhmän mainitun direktiivin kansallista täytäntöönpanoa varten. Työryhmän tehtävänä on mm. arvioida, mitä lainsäädäntömuutoksia direktiivin täytäntöönpano edellyttää ja valmistella tarvittavat lainsäädäntömuutosehdotukset. Tällöin työryhmä arvioi muun muassa sitä onko aiheellista säätää ilmoittamisjärjestelmän soveltamisala direktiiviin verrattuna yleisemmäksi esimerkiksi koskemaan vastaavien alojen kansallisen sääntelyn rikkomisten tai myös muillakin aloilla tapahtuneiden rikkomisten ilmoittamista. Tämän lisäksi valmistelua varten on perustettu myös työ- ja elinkeinoministeriön vetovastuulla oleva alatyöryhmä työläinsäädäntöön liittyviä kysymyksiä varten.

Direktiivin tavoitteena on kokonaisvaltainen lähestymistapa väärinkäytöksistä ilmoittajien suojelun parantamiseksi ja siten soveltamisala kattaa useita EU:n politiikka-aloja. Direktiivin soveltamisala on rajattu aloille, joilla unionin oikeuden rikkominen voi aiheuttaa vakavaa haittaa yleiselle edulle, joilla on havaittu tarve tehostaa unionin oikeuden täytäntöönpanoa ja joilla väärinkäytösten ilmoittajat ovat työnsä yhteiskien vuoksi asemassa, jossa erityisen todennäköisesti voivat joutua todistamaan rikkomuksia.

Oikeusministeriö järjestää yhdessä työ- ja elinkeinoministeriön kanssa info- ja keskustelutilaisuuden 10.5.2021 kello 10-12.30 direktiivin kansallisesta täytäntöönpanosta ja valmistelutyöryhmien työstä ja alustavista linjauksista ja toimeenpanon kannalta keskeisistä kysymyksistä. Tilaisuus järjestetään Teams-kokousohjelman kautta. Pyydämme tilaisuuteen osallistuvia ilmoittautumaan sähköpostitse osoitteeseen [redacted] viimeistään keskiviikkoon 5.5.2021 mennessä. Ilmoittaneille lähetetään linkki kokousohjelmaan sähköpostitse enne kokousta.

Mikäli mieleisänne on direktiivin soveltamiseen liittyviä kysymyksiä, niitä voi lähettää ilmoittautumisen yhteydessä etukäteen.

Tervetuloa!

Figure 2.2.3



**WHISTLEBLOWER KANAVAN KÄYTTÖ VÄÄRINKÄYTÖSRISKIN TORJUNNASSA**

<b>AIKA</b>	Maanantai 7.6.2021
<b>PAIKKA</b>	Teams
<b>VASTUUHENKILÖT</b>	Koulutuspäällikkö Anja Mäkinen, HAUS, puoli- Koulutussuunnittelija Satu Vuorinen, HAUS, [REDACTED]
09.00	<b>Kursin avaus</b>
09.05	<b>Eettisen toimintakulttuurin edistäminen ja väärinkäytösten ehkäisy</b> <ul style="list-style-type: none"> <li>Havaintoja pohjoismaisesta työelämästä – mikä on eettistä tai epäeettistä</li> <li>Miksi epäkohtiin puuttuminen on vaikeaa</li> <li>Työkaluja organisaation ja yksilön toiminnan tueksi</li> </ul> <i>Niina Ratsula, Code of Conduct Company Oy</i>
10.00	Tauko
10.15	<b>Ilmoituskanavat (whistleblowing) osana eettistä toimintakulttuuria</b> <ul style="list-style-type: none"> <li>Miksi tarvitaan</li> <li>Miten käytännössä toimivat</li> <li>Käytännön havaintoja ja kokemuksia</li> </ul> <i>Niina Ratsula, Code of Conduct Company Oy</i>
11.00	Lounastauko
12.00	<b>Ilmoitajansuojadirektiivin täytäntöönpano Suomessa</b> <i>Neuvotteleva virkamies Juha Keränen, oikeusministeriö</i>
13.30	Tauko
13.45	<b>Edellinen aihe jatkuu</b>
15.15	Koulutus päättyy

Figure 2.2.4



**Valtionhallinnon tarkastajat ry**

**JUTTA 2021 -seminaari**

<b>Aika:</b>	Keskiviikko 6.10.2021
<b>Paikka:</b>	Sokos Hotel Tripla, Fredrikanderassi 1 B, 00520 Helsinki tai etäyhteys (linkki toimitetaan osallistujille)
8:30 – 8:55	Aamukahvi
8:55 – 9:00	VHT-yhdistyksen puheenjohtaja avaa tilaisuuden (Olavi Vuotilaan/Vero) <b>LÄSNÄ</b>
9:00 – 10:15	Tarkastuksen tulevaisuus <ul style="list-style-type: none"> <li>Tilintarkastus alustus (15 min, Juha Huuskonen/ KPMG) <b>ETÄNÄ</b></li> <li>Sisäinen tarkastus alustus (15 min, Niina Ratsula/Code of conduct Oy) <b>LÄSNÄ</b></li> </ul> Keskustelu tulevaisuuden näkymistä ja yhteistyötarpeista paneelissa (45 min) Paneelin moderaattori: Olavi Vuotilaan <b>LÄSNÄ</b> Paneelissa mukana: Niina Ratsula <b>LÄSNÄ</b> , Juha Huuskonen <b>ETÄNÄ</b> , Virpi Ala-aho/Espoon kaupunki <b>ETÄNÄ</b> , Jaakko Eskola /VTV <b>ETÄNÄ</b>
10:15 – 10:30	Tauko
10:30 – 11:30	Real Time Economy (RTE) -hanke <ul style="list-style-type: none"> <li>Hankkeen esittely ja pohjoismaainen yhteistyö (hankejohtaja Mirna Rintala, PRH) <b>ETÄNÄ</b></li> <li>Liiketoiminnan tositteet, (maksuliikennepäällikkö Keijo Kettunen, Valtiokonttori) <b>ETÄNÄ</b></li> <li>Verotus osaksi regaalitalouden ekosysteemiä (Sanna Esterinen, Vero) <b>ETÄNÄ</b></li> </ul>
11:30 – 12:30	Lounas
12:30 – 13:15	Toimivat sisäisen valvonnan menettelyt ja kontrollit paikallishallinnossa: Helsingin kaupungin sisäinen valvonta, esimerkiksi kasvatuksen ja koulutuksen toimiala (talous- ja suunnittelupäällikkö Tero Vuontisjärvi (kasvatuksen ja koulutuksen toimialalta) <b>ETÄNÄ</b> ja sisäinen tarkastaja Riikka Koivunen (Helsingin kaupungin sisäisestä tarkastuksesta) <b>ETÄNÄ</b>
13:15 – 14:00	ARA rahoitusta saaneiden yhteisöjen tarkastukset (HT, JHT, ylitarastaja, Ritva Weckström, ARA) <b>LÄSNÄ</b>

# ANNEX 4: EVIDENCE

## COMMITMENT 2.3

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**Commitment 2.3 a) Set up an operational cooperation group to enhance the fight against corruption and improve operational cooperation between the authorities**

**Figure 2.3.1 Internal letter by the Ministry of Justice: Designation of the contact person for the prevention and combatting of corruption**



Kriminaalipolitiikka- ja rikosoikeusosasto

VN/4280/2020

20.10.2021

Jakelussa mainituille

### MINISTERIÖIDEN KORRUPTIONVASTAISEN TYÖN YHTEYSHENKILÖN NIMEÄMINEN

Valtioneuvoston periaatepäätös kansalliseksi korruptionvastaiseksi strategiaksi ja toimenpideohjelmaksi annettiin 27.5.2021 (OM/2021/68).

Korruptionvastaisen strategian toimenpideohjelmassa 1.1.1. tavoitellaan korruptionvastaisen työn koordination ja yhteistyön tehostamista. Yhtenä toimenpiteenä kaikkien ministeriöiden vastuulla on nimetä korruption torjunnan ja ennaltaehkäisyn yhteyshenkilö. Yhteyshenkilön tehtävänä on pitää korruption torjuntaa esillä oman organisaationsa sisällä, seurata strategian täytäntöönpanoa ja raportoida siitä oikeusministeriölle, joka tukee ministeriöiden korruptionvastaista työtä.

Yhteyshenkilö voi olla sama kuin korruptionvastaisen strategian ja toimenpideohjelman valmistelu- ja ohjaustyöryhmään nimetty henkilö, mutta tarvittaessa ministeriöt voivat nimetä eri henkilön tähän tehtävään.

Ministeriöitä pyydetään nimeämään yhteyshenkilö, joka on vastuussa edellä mainituista toimista 3.11.2021 mennessä. Pyydämme lähettämään tiedon yhteyshenkilöstä kirjaamoon, osoitteeseen [REDACTED] sekä erityisasiantuntija [REDACTED] tel. 0295 150 198. Annamme lisätietoja tarvittaessa.

Yhteyshenkilöä nimettäessä pyydetään huomioimaan molempien sukupuolten riittävä edustus naisten ja miesten välisestä tasa-arvosta annetun lain (608/1986) 4 a§:n mukaisesti.

# ANNEX 5: EVIDENCE

## COMMITMENT 7.1

### Commitment 7.1 Organise thematic training on the risks of corruption for officials, internal auditors and elected officials engaging in procurement

Event / Training	Audience	Content of the training	Date	Evidence
<b>Compliance Seminary 2019</b>	Legal professionals	General anti-corruption topics. Including public procurement	12.02.2019	No public evidence was found. The Ministry of Justice provided the agenda of the event (Figure 7.1.1) to the researchers of this report.
<b>Training day of the auditors of public sector</b>	Public sector auditors	Public procurement strategy 2020	19.01.2021	No public evidence was found. The Ministry of Justice provided the agenda of the event (Annex 3, Figure 2.2.1) to the researchers of this report.
<b>Corruption risks - recognition and investigation</b>	Internal auditors	General anti-corruption, abuse of positions in procurement	10.9.2021	Event description on IIA website: <a href="https://theiia.fi/events/vaarin-kaytosriskit-tunnista-ja-tutki/">https://theiia.fi/events/vaarin-kaytosriskit-tunnista-ja-tutki/</a>
<b>Anti-Corruption Day</b>	Various	Agenda includes corruption risk areas, such as public procurement	9.12.2021	Event description on government website: <a href="https://valtioneuvosto.fi/-/1410853/korruptionvastainen-paiva-9.12.-luotaa-suomalaista-korruptiontorjuntaa">https://valtioneuvosto.fi/-/1410853/korruptionvastainen-paiva-9.12.-luotaa-suomalaista-korruptiontorjuntaa</a>
<b>Anti-corruption training - Association of Finnish Municipalities</b>	Internal auditors, municipal level decision makers and civil servants	municipal corruption risks (including public procurement)	26.1.2022	No public evidence was found. The Ministry of Justice provided the agenda of the event (Figure 7.1.3) to the researchers of this report.
<b>Anti-corruption training – Hansel</b>	Staff of Hansel, the public procurement authority	Hidden corruption risks for public procurement,	7.4.2022	No public evidence was found. The Ministry of Justice provided the agenda of the event (Figure 7.1.4) to the researchers of this report.

Figure 7.1.1

**Compliance 2019**  
12.2.2019 Radisson Blu Seaside Hotel, Ruoholahdenranta 3, Helsinki

Puheenjohtajana toimii Counsel Mervi Pyökäri, Asianajotoimisto Krogerus Oy.

8.30	Ilmoittautuminen ja aamukahvi
9.00	Seminaarin avaus ja johdatus päivän teemoihin
	Ajankohtaiskatsaus: sääntely ja tuomioistuintratkaisut Counsel Mervi Pyökäri, Asianajotoimisto Krogerus Oy
9.30	Piilokorruptio: esimerkitapauksia ja kansalaisten arvioita Emeritusprofessori Ari Salminen, Vaasan yliopisto
10.15	Keskustelua ja tauko
10.30	Korruptio ja sen riskialueet Suomessa Erityisasiantuntija Juuso Oilinki, oikeusministeriö
11.30	Lounas
12.30	Compliance riskiarvio käytännössä, menettelytavat ja työkalut SVP, Group Ethics and Compliance Officer Camilla Orko, Telenor
14.00	Iltapäiväkahvi
14.15	Talousrikostutkintojen käytännöt Rikosylikomisario Matti Räsänen, Talousrikostorjunta-yksikkö, Keskusrikospoliisi
15.00	Syöttäjäilaitoksen puheenvuoro sen toiminnasta lahjonta- ja talousrikosasioissa Kihlakunnansyöttäjä Tuire Tamminiemi, Helsingin syöttäjänvirasto
16.00	Kysymyksiä ja keskustelua
16.15	Puheenjohtajan loppuyhteenvedo ja seminaarin päätös

Figure 7.1.2

Sisältökuvaus Kuntaliiton koulutus 26.1.2022

<ul style="list-style-type: none"><li>- Harmaasta alueesta tuomittavaan – korruption monet muodot</li><li>❖ Häikäsestä Suomessa tuomittavaan poliittinen päätöksenteko, kaavoitus</li><li>- korruption torjunta ja hyvän hallinnon vahvistaminen</li><li>❖ Hallinnon muutoksiin ja hyvinvointialueisiin liittyvät kysymykset</li><li>❖ Korruption torjunta ja riskialueet Suomessa: julkiset hankinnat</li><li>❖ Pienryhmätyö</li><li>❖ Korruption erilaisia ilmenemismuotoja paikallishallinnossa: poliittinen päätöksenteko, kaavoitus</li><li>❖ Pienryhmätyö</li><li>❖ Korruption torjunta ja hyvän hallinnon vahvistaminen kunnissa</li><li>❖ Loppukeskustelu</li></ul>	<p><b>Yhteyshenkilö: Marja-Liisa Ylitalo</b></p> <p><b>Kouluttajat: Venla Mäntysalo, Juuso Oilinki (OM)</b></p>
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Markus Kiviäho (IA Insight), Mikko Knuutinen

## Figure 7.1.3

### HANSEL – korruptiontorjuntakoulutus

7.4.2022 13 - 16

OM, Venla Mäntysalo, Juuso Ollinki

IA Insight, Markus Kiviahho

#### Päivän ohjelma

13.00 – 13.30	<p>Päivän avaus (Hansel)</p> <p>Venla M.:</p> <p>Korruptio ilmiönä</p> <ul style="list-style-type: none"><li>- käsitteet, piilokorruptio, rakenteellinen korruptio,</li><li>- organisaation oikein toimimisen kulttuuri</li><li>- pohdittavaksi mitä korruption muotoja tunnistaa tai havaitsee omassa työssä</li></ul>
13.30 – 14.15	<p>Juuso O.:</p> <p>Korruption riskialueet, julkiset hankinnat</p> <p>Korruptiontorjunta kriisiaikana ja korruptionvastainen strategia</p> <p>Q&amp;A (5min)</p>
14.15 – 14.25	<p>Tauko</p>
14.25 – 15.15	<p>Markus K.:</p> <p>Korruptio paikallishallinnossa, erityisesti julkiset hankinnat</p> <p>Hyvinvointialueet?</p> <p>Q&amp;A (5min)</p>
15.15 – 15.20	<p>Tauko</p>
15.20 – 15.40	<p>Korruptiontorjunta</p> <ul style="list-style-type: none"><li>- organisaation ja yksilön rooli</li></ul>
15.40	<p>Loppukeskustelu ja kysymykset</p>

# ANNEX 6: EVIDENCE

## COMMITMENT 8.1

**Commitment 8.1 Targeted education: Give specialised, and when necessary, joint training sessions, on corruption to special prosecutors, police officers, the staff at courts of law and the Financial Intelligence Unit**

Event / Training	Audience	Content of the training	Date	Evidence
<b>Course on corruption crime/MoJ, State prosecutors office</b>	Prosecutors, judges, law enforcement	Identification of corruption crimes especially in business	5. -6.11.2019	No public evidence was found. The Ministry of Justice provided the agenda of the event (Figure 8.1.1) to the researchers of this report.
<b>Corruption in international business</b>	Wide audience, including prosecutors and judges	Corruption in international business, report publication of the VNTEAS-project	8.2.2021	No public evidence was found. The Ministry of Justice provided the agenda of the event (Figure 8.1.2) to the researchers of this report.
<b>Anti-Corruption and Anti-Money Laundering in Nordic Business Environment</b>	Nordic anti-corruption and AML (Anti Money Laundering) authorities and obliged reporting entities	Panel discussion on AML and anti-corruption activities in the Nordics, related to KORPEN report	16.2.2022	Event description on Nordic Council of Ministers' website: <a href="https://www.norden.org/fi/node/69851">https://www.norden.org/fi/node/69851</a>

**Figure 8.1.1**

Yksitysoikeus- ja oikeudenhoito-osasto Tuomioistuinasiat-yksikkö	<b>OHJELMA</b> 3.5.2019	12.00	Lounas
		13.00	<b>Teema jatkuu</b> Pekka Viljanen
<b>KORRUPTIORIKOKSET</b>		14.00	Kahvitauko
Aika 5. – 6.11.2019		14.20	<b>Oikeustapausten käsittelyä</b> Tuire Tamminiemi, kihlakunnansyyttäjä, Helsingin syyttävävirasto
Paikka Oikeusministeriön koulustilat, Pihapaviljonki, Metsä-sali Snellmaninkatu 5, sisäpiha, 2. kerros, Helsinki		16.30	Koulutuspäivän päätös
Kohderyhmä Yleisten tuomioistuinten tuomarit, syyttäjät ja ulosoton erikoisperinnan henkilöstö. Poliisille ja verohallinnolle varataan muutama paikka koulu- tuksesta.			
Tavoite Koulutuksen tavoitteena on parantaa valmiuksia tunnistaa korruptiorikok- sia erityisesti kotimaisessa ja ulkomaisessa elinkeinotoiminnassa. Tavoit- teen saavuttaminen edellyttää viranomaistoiminnassa tehtyjen lajusrikosten tunnusmerkistöjen tuntemista. Lainsäädännön tuntemisen lisäksi sään- nösten soveltaminen edellyttää käytännön oikeustapauksiin perehtymistä. Tehtäks korruptiontorjunta vaatii myös menettämisseuraamus-, rahan- pesu- ja oikeushenkilön rangaistusvastuusääntösten sekä liiketoimintakiel- lön ymmärtämistä. Koulutuksen avulla pyritään lisäämään viranomaisten välisiä verkostoitumista.			
Toteutustapa Luontopainotteinen koulutus. Ennakkomateriaaliin tutustuminen.			
Puheenjohtajat Kaarlo Hakamies, kärjätuomari, Länsi-Uudenmaan kärjäoikeus ja Ritva Sahavirta, valtiosyyttäjä, Valtakunnansyyttäjänvirasto		12.00	Lounas
Vastuukehittäjät Koulutusasiantuntija Arja Kinnunen ja koulutuskoordinaattori Katja Tuominiemi		13.00	<b>Teema jatkuu</b> Kalle Määttä
Toivomme, että sitoudut koulutukseen oleamalla paikalla ajoissa ja osallis- tumalla siihen loppuun saakka.		13.40	Tauko 10 min
<b>TIISTAI 5.11.2019</b>		13.50	<b>Tahallisuuden näyttäminen korruptiorikoksissa</b> Pekka Koponen, oikeusneuvos, korkein oikeus
9.30 Tulokahvi		15.10	Kahvitauko
10.00 <b>Päivien avaus ja tavoitteet</b>		15.30	<b>Konfiskaatio ja rahanpesu</b> <b>Oikeushenkilön rangaistusvastuu</b> <b>Liiketoimintakiellot</b> Ritva Sahavirta, valtiosyyttäjä, Valtakunnansyyttäjänvirasto
10.15 <b>Korruption tunnistaminen</b> Juuso Oilinki, erityisasiantuntija, oikeusministeriö		16.30	Koulutuksen päätös
11.00 <b>Tunnusmerkistö ja ulkomaisen virkamiehen lahjonta</b> Pekka Viljanen, emeritusprofessori, Turun yliopisto			

Käyntiosoite Snellmaninkatu 5 HELSINKI	Postiosoite PL 22 00023 VALTIONLUVOSTO	Puhelin Asja Hirvonen 02951 50227	Puhelin Katja Tuominiemi 02951 50015	Sähköpostiosoite otunimi.sakunni@om.fi
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**Figure 8.1.2**
**Lahjonta kansainvälisessä liiketoiminnassa**
**Seminaari 8.2.2021, klo 13.00–16.00**
[Teemas-linkki](#)
*Seminaarin ohjelma:*

- 13.00–13.10 Seminaarin avaus  
Juuso Oilinki, OM
- 13.10–13.45 Lahjonta kansainvälisessä liiketoiminnassa – kansallinen lajusrikossääntelyn  
katvealue?  
Minna Kimpimäki, Lapin yliopisto
- 14.00–14.35 Oikeushenkilön vastuu kansainväliseen liiketoimintaan liittyvissä  
lahjusrikostapauksissa  
Anssi Kärki, Lapin yliopisto
- 14.45–15.00 Tauko
- 15.00–15.35 Lahjusrikoksia käsittelevän koulutuksen nykytila ja muutostarpeet  
Kirsi-Maria Halonen, Lapin yliopisto
- 15.50–16.00 Päätössanat  
Juuso Oilinki, OM

Contact us!

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