



**“A CHILD IS A CHILD,  
NOT AN UNDOCUMENTED  
PERSON”**

A report on services for undocumented children and families and on access to these services

**“A child is a child, not an undocumented person” –  
A report on services for undocumented children and  
families as well as access to these services.**

Author: Maiju Remes

Layout: Heidi Majdahl

Translation: Maailmankansalaiset Oy

Edited by Emma Grillo Kajava

**Save the Children Finland 2024**

ISBN: 978-952-7112-79-3

ISSN: 1459-9392: 40



# Contents

<b>FOREWORD</b>	<b>4</b>
<b>1 INTRODUCTION</b>	<b>5</b>
<b>2 PURPOSE AND SCOPE OF THE REPORT</b>	<b>7</b>
<b>3 SERVICES FOR UNDOCUMENTED FAMILIES WITH CHILDREN IN LIGHT OF LEGISLATION AND PREVIOUS RESEARCH</b>	<b>9</b>
<b>4 METHODOLOGY</b>	<b>11</b>
<b>5 RESULTS</b>	<b>13</b>
The third sector organises a wide variety of services for undocumented persons	13
A challenging path to services	14
Poverty prevents children from undocumented families from living a normal childhood	19
Knowledge and understanding of the situation and rights of undocumented families is lacking	21
The future worries especially children and young people from undocumented families	24
<b>6 CONCLUSIONS</b>	<b>27</b>
<b>7 RECOMMENDATIONS TO DECISION-MAKERS AND PROFESSIONALS</b>	<b>29</b>
<b>SOURCES</b>	<b>33</b>

# FOREWORD

The goal of Save the Children’s work is to support children and to ensure that the rights of every child are fulfilled both in Finland and around the world. We focus on reaching the most vulnerable children who are too often left out because of their poverty, place of residence or whereabouts, ethnic background or disability, for example. We strive to improve children’s lives – in their everyday lives and in times of crisis – and build a better future for children for good.

Undocumented children are a small and marginal group in Finland, which can, with good reason, be seen as among the most vulnerable.

As stated in this report published by us, there really should not be any undocumented children at all. Undocumented status is a tricky equation of difficult and human fates as well as political decisions, where the child is always a victim of the situation.

As long as there are undocumented children in our society, it is also extremely important to ensure that these children have access to the services they need, thereby also guaranteeing that the rights of these children to life, protection, learning and inclusion are fully realised.

In the Usra – Family in Finland (Usra – Perheenä Suomessa) project implemented in 2021–2024, our organisation began to pay more attention specifically to the needs of families with children living life as undocumented and the fulfilment of the rights of undocumented children in Finland. The project aimed to find ways to support children and parents in coping together, as a family, in the difficult and changing situations of being a refugee. The experiences and voices of some of these families are also heard in this report.

The work continues as part of our organisation’s refugee work. With its work encountering families, Save the Children is doing its part to ensure that every child has the opportunity to participate in activities that are meaningful to them and that parents have access to the parenting support they need. At the same time, we engage in advocacy work to ensure that all children have the opportunity to get the healthcare, protection, education and early childhood education and care they need as well as the opportunity for play and leisure in Finland as well.

With this work, we are carrying out our mission, which is to be a channel for children’s voices and demands as well as to defend the most disadvantaged children. Because children’s future starts now.

**Hanna Markkula-Kivisilta**  
Secretary General

# 1 INTRODUCTION

*“The biggest challenge is that there really should not be any undocumented families with children at all.”*

This message came up time and again in the expert interviews conducted for this report in February 2024. Many families with children have been driven into a kind of undocumented status, which in many of the interviews is described as, among other things, “constant motion”, “on-again, off-again” and “a limbo without rights”. Behind these realities are insufficiently investigated grounds for asylum as well as changes in legislation, such as the removal of humanitarian protection from the grounds for granting a residence permit in 2016, which rendered many families with children, some of whom had been living in Finland for years already, undocumented. In some families, only some of the family members have a residence permit.

For many undocumented families, being undocumented has been and still is a process that you fall into as your residence status varies between the processing stages of residence permits, negative decisions and re-processing to new applications and their processing stages. Organisations that help undocumented persons, with a strong emphasis on the third sector, are trying to find out what services these varying residence statuses make possible for families at any given time and how families living in these situations, which often seem hopeless, could find a way to legalise their residence. This report examines services for undocumented families with children and their experiences of accessing them through expert interviews and a survey conducted for Arabic-speaking families.

The Finnish Refugee Council estimates that there are 3,000–6,000 undocumented persons in Finland, some of whom are minors.<sup>1</sup> The figures are estimates because undocumented persons cannot be found in the population information systems. There are no statistics on the number of undocumented families with children either, but it is estimated that there are dozens if not even hundreds of them.<sup>2</sup> Being undocumented usually means living in a country without the right of residence. However, there is no established definition and different authorities define undocumented status in different ways. In the definitions of the Ministry of the Interior, an undocumented person is a person without a legal right of residence, while the Finnish Institute of Health and Welfare, for example, examines the issue through whether a person has the right to social and health services. The responsibility for organising services comes through the municipality of residence, i.e. people who do not have a municipality of residence also do not have the right to social and health services at the same level as municipal residents. On the other hand, lacking a municipality of residence does not automatically mean being undocumented, nor does a legal residence permit mean that a person has the right to social and health services.<sup>3</sup> In this report, undocumented persons are defined as people who are excluded from comprehensive social and health services, of whom the focus is mainly on undocumented persons with an asylum seeker background, as the report was carried out as part of a refugee work project. Undocumented persons with an asylum seeker background are also by far the largest group of undocumented persons.<sup>4</sup>

1 Finnish Refugee Council, pakolaisapu.fi

2 Deaconess Foundation, hdl.fi

3 Katisko, Annala et al. 2023, 11–12

4 Publications of the Ministry of the Interior 2022:16, 13

A large portion of the undocumented persons with an asylum seeker background are so-called newly undocumented persons. This refers to an undocumented status resulting from for granting a residence permit and the temporary residence permit, which until then had been possible to obtain in cases where repatriation to the country of origin was not possible, was also abolished. After this, obtaining a temporary residence permit has only been possible if one has agreed to return to the country of origin voluntarily, but this has not been successful.<sup>5</sup> In 2015, the number of reception centres increased tenfold from 20 to around 200, where, according to the Finnish Immigration Service's report, the new employees hired did not always have sufficient skills to provide asylum seekers with general legal advice.<sup>6</sup> This, among other things, may have led to errors in the asylum process, such as in the investigation of the grounds for asylum, which may now be impossible for the families to correct. According to the Finnish Immigration Service, there were approximately 3,000 newly undocumented persons residing in Finland in October 2021, of which 57%, or approximately 1,710, were Iraqi citizens. That is, a large proportion of long-term undocumented persons are Arabic speakers. Approximately 10%, or about 300, of all the newly undocumented persons were children.<sup>7</sup>

“Undocumented” is rarely how a person living with undocumented status wants to be defined. Most of the time, it is first and foremost a temporary situation. From the state's perspective, on the other hand, undocumented migrant is an administrative term defining status. Undocumented persons often have various documents about their identity or previous rights of residence, which, in part, makes the term “undocumented” inaccurate.<sup>8</sup> In this report, this term is used for easier readability, but it is used with awareness of the aforementioned problems.

Pursuant to section 19 of the Constitution of Finland, all who are residing in the country, i.e. also undocumented persons, have the right to receive indispensable subsistence and care. However, according to a report published by the Prime Minister's Office in 2023, there are large variations in how this social right is implemented in practice. Variations in obtaining services are also caused by how the person has become undocumented. In the case of health services for people with an asylum seeker background, the state currently pays compensation to the wellbeing services counties that provide the service.<sup>9</sup> Regional differences in obtaining services and service provision have come up in Save the Children's Usra – Family in Finland project and in other work done by Save the Children. The experiences collected for this report are from experts and families in the Helsinki and Turku regions, but the situation in the rest of Finland has also figured in the discussions.

The report has been carried out by Save the Children Finland's *Usra – Family in Finland* project. In 2021–2024, the project has developed activities to support families in a difficult situation, such as undocumented families, asylum seeker families or families with a refugee background who are at risk of being marginalised. The project has focused especially on supporting positive parenting by utilising the *Safe Families* approach of the international Save the Children organisation. The project has developed, among other things, the *Wonderful Usra* (Ihana Usra) group activity model for working with families as well as tools for working with children who speak different languages. The activities of the Usra project are financed by STEA.

5 Turun Valkonauha ry 2022, 4

6 Finnish Immigration Service 2018, 7

7 Publications of the Ministry of the Interior 2022:16, 15–16

8 Katisko, Annala et al. 2023, 12

9 Katisko, Annala et al. 2023, 8

## 2 PURPOSE AND SCOPE OF THE REPORT

This report has investigated the services available to undocumented children and families and experiences of accessing them in the Helsinki and Turku regions, as well as the views of experts and families on the service needs of undocumented persons and the future of the services. The aim of the report has been to generate new information about the target group and use it in Save the Children's advocacy work, which promotes the fulfilment of the UN Convention on the Rights of the Child.

In this report, undocumented families with children are families where at least some of the family members live or have lived as undocumented. Some of the families who responded to the survey had experienced being undocumented earlier in their lives. The target group of the report was narrowed down to undocumented families with children living in the Helsinki and Turku regions because we were aware of some undocumented families and had contacts with experts working on undocumented issues through the Usra project in these areas.

### THE RESEARCH QUESTIONS ARE AS FOLLOWS:

- What services are undocumented children and families entitled to and how are these realised in practice?
- How do children and families find and access to services?
- What kind of service needs do children and families have and what is the future of the existing services seen as?

The information generated in the report aims to promote the rights of particularly marginalised and vulnerable children. The UN Convention on the Rights of the Child states:

*“States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.”*

That is, in addition to discrimination related to the child's characteristics, the Convention also prohibits any kind of discrimination based on characteristics related to the child's parent or legal guardian, which can be considered to also include undocumented status. Furthermore, pursuant to the Convention, the best interests of the child shall be a



primary consideration in all actions concerning children, whether undertaken by social welfare institutions, courts of law, administrative authorities or legislative bodies.<sup>10</sup> The report also aims to promote Article 22 of the Convention, under which the state has an obligation to protect refugee children and ensure the fulfilment of their rights, as well as numerous other articles of the Convention which ensure the child’s access to various activities and services essential to the child’s development and well-being, such as registration (Article 7), information (Article 17), healthcare (Article 24), social security and an adequate standard of living (Articles 26 and 27), education (Article 28), leisure as well as artistic and cultural life (Article 31).<sup>11</sup>

---

10 Katisko, Annala et al. 2023, 44–45; Convention on the Rights of the Child, 1989

11 Convention on the Rights of the Child, 1989





# 3 SERVICES FOR UNDOCUMENTED FAMILIES WITH CHILDREN IN LIGHT OF LEGISLATION AND PREVIOUS RESEARCH

Services for undocumented persons seem to be the clearest when it comes to health-care, which is also the area with by far the most research conducted and laws that leave the least room for interpretation. Children have a broader right than adults to all the same services as other children who have a municipality of residence in Finland. Care must also be arranged for the child's guardian if a failure to provide care endangers the guardian's ability to care for the child and is against the child's best interests.<sup>12</sup> Undocumented persons always have the right to urgent healthcare. However, this is based on an interpretation of what is considered to be urgent. The right to some non-urgent but necessary health services was added to the law during the previous government term, but according to the Government Programme of the current Government, this decision is proposed to be repealed.<sup>13</sup> These services include, for example, maternity and child health clinic services related to pregnancy and childbirth, contraceptive services and termination of pregnancy, the elimination of which would especially affect families with children. The wellbeing services counties have the right to decide on the services they offer, but the absence of state funding would jeopardise the possibilities of organising these services in the future.<sup>14</sup>

The right to social services is based on residence. Basic social rights, such as the right to housing, belong to everyone residing in Finland under the Constitution and international human rights treaties, regardless of their resident permit status and the type of permit it is. International treaties binding on Finland include the United Nations Covenant on Economic, Social and Cultural Rights (ESC rights) (Finnish Treaty Series 6/1976) and the European Convention on Human Rights (Finnish Treaty Series 18–19/1990, 85–86/1998). The Constitution of Finland defines the right to receive indispensable subsistence and care. The implementation of this is up to the wellbeing services counties. In many places in Finland, undocumented persons receive help with their basic needs mainly from the third sector.<sup>15</sup>

Comprehensive school and early childhood education and care are not social services, but they are important rights of undocumented children. Municipalities must organise early childhood education and care for children whose municipality of residence is the

12 Ministry of Social Affairs and Health, [stm.fi](http://stm.fi)

13 Programme of Prime Minister Petteri Orpo's Government

14 Toivanen, 3 August 2023

15 Katisko, Annala et al. 2023, 13

municipality in question, but “in urgent cases and if circumstances otherwise so require” also for other children staying in the municipality. According to the Prime Minister’s Office’s report (2023:6), the access of undocumented children to early childhood education and care is poorly realised and often requires active efforts from social services and the third sector. Getting a place in daycare often requires that child welfare services have deemed early childhood education and care to be necessary for the child in question. Some municipalities in Finland have refused to organise early childhood education and care for undocumented children, citing the lack of a statutory obligation. However, a statutory obligation does exist as described above; this shows that the rights of undocumented children are not always fulfilled in practice.<sup>16</sup>

The situation is better when it comes to going to school. Undocumented children have the right to go to school, although they are not subject to compulsory education, like children living permanently in Finland. In practice, however, access to school can also be a challenge due to, for example, deficiencies in terms of a social security number or permanent residence. Lack of knowledge about the right to go to school or the fear of being reported to the police can also prevent undocumented persons from applying for basic education.<sup>17</sup>

Undocumented status has been studied quite extensively in Finland, but there has been lesser focus on the situation of children and families with children. Previous studies and statements bring up concerns about the particularly weak position of undocumented children in Finland. A master’s thesis about undocumented persons and parenting was completed recently at Tampere University. The thesis by Maaroo Niskanen examines parenting experiences as an undocumented parent in Finland through interviews. Although services were not the research subject, some of their impact has come up in the data. According to this thesis, among other things, the experience of “being a bad parent” is something that impairs the mental health of the families in question<sup>18</sup>, from which it could be concluded that more services related to parenting support are needed for undocumented persons.

---

16 Katisko, Annala et al. 2023, 47

17 Lindroos, 27 May 2020

18 Niskanen 2023, 42

## 4 METHODOLOGY

Written sources, expert interviews and a survey in Arabic conducted for families were used as the data for this report. Interviews were held with a total of eight experts working on matters relating to undocumented persons from the Helsinki and Turku regions in February 2024. The expert interviews provided us with a broad perspective on the situation of undocumented families. The organisations giving the expert interviews were Turvapaikanhakijoiden tuki ry – Support for asylum seekers, the Deaconess Foundation, Finnish Red Cross, Turun Valkonauha ry, the Blue Ribbon Foundation and the Church Council of Finland.

In addition, a Forms-based survey was translated into Arabic and conducted for families. The survey made it possible to collect experiences from several families regarding the use of services and the situation of undocumented families with children, as carrying out interviews would have been difficult due to scheduling reasons. Of the six parents who responded, half had been undocumented at some point after 2016 and half were undocumented at the time of responding. The families had lived in Finland for two to nine years and had children aged 0 to 15.

The interview material was transcribed and then reviewed and categorised, i.e. matters outside the scope of the research questions were excluded and essential points from the interviews were divided under suitable categories. Doing this meant that the discussions that emerged did not have to be abridged, e.g. written in a condensed form; instead, the interview segments could remain quite long and the information generated in the interviews could be analysed and compared to previous information in its own context.

Undocumented persons constitute a particularly vulnerable group, which is why ethics has been given special consideration in the report. It is important to have well-founded reasons for studying a vulnerable group. The need to generate more information about the services for undocumented families with children has come up in the Usra project, so there were good grounds for producing this report.

The number of undocumented families with children in Finland is fairly low, so it is important to protect the anonymity of individual persons. The experts saw to the anonymity of individuals for their part and the survey of families was structured such that responding was possible while also maintaining anonymity. The voluntary nature of participation and the possibility to discontinue or withdraw participation were emphasised both to the experts and to the families responding to the survey. A written agreement was drawn up regarding participation in the expert interviews as well as the use and archiving of the data. The participating organisations could decide for themselves whether to participate in the report anonymously or by using names.

The survey was conducted for families known through the Usra project. This possibly made it easier for the families to trust the body preparing the report. We were also able to limit the language used to Arabic, which reduces the chance of translation errors. The families in the Usra networks also had contact with the Usra project workers, making it easier for them to ask a familiar person further questions, withdraw their participation at a later stage or ask for help if the survey were to cause them anxiety, for example.

This report has been carried out in a data-based way, using qualitative research methods. Therefore, the aim is to bring forth meanings through data and to understand, through individual cases, the reality in which undocumented families may be living in Finland. In qualitative research, the amount of data may be small, the purpose of it not being to create generalisable information, as is the case in quantitative research, but to gain insight into the possibly similar situation of other undocumented persons.<sup>19</sup> On the other hand, in the interviews, the experts have been able to reveal a broader picture of life as an undocumented person in Finland as well.

The small amount of data and the limitation of the survey to Arabic-speaking families impose their own restrictions on the report. The report was mainly carried out for services limited to undocumented persons, which resulted in a comprehensive understanding of the situation of those undocumented persons who use these services. On the other hand, this report was not able to form a broad picture of the situation of those outside of these services and in other regions of Finland, such as those relying mainly on services provided by municipalities and cities.



19 Saaranen-Kauppinen & Puusniekka 2006

## 5 RESULTS

### The third sector organises a wide variety of services for undocumented persons

There are hardly any services intended specifically for undocumented families with children, but undocumented persons have certain rights to existing services intended for everyone, which were described in the previous chapters. Families with children have a better chance of becoming clients of public services than other undocumented persons, but they also face challenges in this regard which will be explained in more detail in the next chapter. In Helsinki and Turku, services aimed directly at undocumented persons are organised mainly by third sector operators, although there is also a social work unit and health services focusing on undocumented persons in Helsinki. In the last few years, Turku has been developing a service path for undocumented persons in the same way as is the case in Helsinki, and based on the interviews, the service situation in Helsinki is also seen as desirable in Turku. The recent Covid-19 pandemic accelerated the development of services in Turku, as it was noticed that it is against everyone's interest for one group of people to be excluded from vaccinations and the use of face masks.

In addition to these big cities, the interviews touch on smaller municipalities and towns where, according to the interviewees, the situation is often not very good. Many of the interviewed experts come from organisations that arrange advice and guidance for undocumented persons on the services that they are entitled to. The interviewees doing this kind of guidance work shared their experiences of how they receive contacts from smaller localities, both from the clients themselves and from public service providers:

*"When the first undocumented parent, the first mother without a residence permit, comes to a small municipality, it means getting to the bottom of this issue in that municipality. At that point, we cooperate with the authorities, figure things out and guide these municipalities to produce services according to the law for undocumented parents."*

SANNA VALTONEN, TURVAPAIKANHAKIJOIDEN TUKI RY - SUPPORT FOR ASYLUM SEEKERS.

In addition to service coordination, third sector operators organise day centre activities, group activities, events and excursions, volunteer help for running errands, support for children and families as well as material assistance, such as food, clothing, household items and bus tickets, among other things, for undocumented individuals. One important service that these operators offer is legal aid and advice with the aim of legal residence in Finland. Turvapaikanhakijoiden tuki ry – Support for asylum seekers, for example, follows the principle of "residence permit first", i.e. the service starts from the comprehensive mapping of the client's situation and their possibility of obtaining a residence permit on some grounds. The activities of the Deaconess Foundation's Al Amal

day centre, for example, have made it possible for hundreds of undocumented persons to legalise their residence and thus escape being undocumented. The House for All Women (Kaikkien Naisten Talo) run by the association Turun Valkonauha ry organises guidance and advice for undocumented persons or others facing challenges with their residence permit, as well as group activities for women and children. In addition to the work done for official residence, it has been considered especially important to be able to provide particularly vulnerable and marginalised clients with an experience of inclusion through the activities:

*In a way, the primary function of our centre is to offer these people, who are excluded from society, a space where they can feel included and get involved in the activities. Then, through client work, when we figure out the overall situation of that person, it also clarifies their perception of their own situation and how they can influence it. This has an effect on inclusion as they are more aware of their own situation, the services that they are entitled to and what they can do at any given point, because these people have been driven to the margins of society linguistically, systemically and structurally. “Margins” does not even adequately describe how the undocumented are positioned on the outskirts.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.

### A challenging path to services

Undocumented families face many challenges in finding and obtaining services. The third sector operators interviewed for this report organise guidance and advice for undocumented families on public services, among other things. The interviewees are not very worried about whether the families will find the third sector services they offer; they have more concerns about them finding and being able to access public services. There is some concern about the phenomenon of a shadow society, which refers to families living completely outside of services in their own networks, in which case children will also be left without, for example, education, healthcare and other services. When a family with an asylum seeker background becomes undocumented, i.e. when they receive a negative asylum decision and their reception services end, there is a particular risk of being excluded from services. Obtaining information about services can be difficult, the family may not know what services they are entitled to when looking for them or, in some cases, families have a lack of trust in public services despite there being a duty of confidentiality in social welfare and healthcare. **Miska Keskinen**, Specialist at Finnish Red Cross, describes the possible reasons for falling outside of services as follows:

*The first thing is, of course, fear. If you are in the country without a residence permit, you don't necessarily want contact with the authorities, and even if one spouse in the family has it [a residence permit], the other spouse will hide and stay at home, for example, just because they fear what will happen due to their own status. The other thing is the language competence of both; whether they have sufficient skills to even find out about these things. Cultural reasons: there is no*



*social security in their home country, so why would there be any here, i.e. they are not aware of their rights. Even the spouse who is employed does not necessarily know what social rights they have in Finland.*

The interviewed experts voiced that building trust has been made possible, for instance, by having employees from multiple language groups and them being individuals who are already part of the communities to some extent. In addition, word has spread within the communities about the day centres and help points that have been in operation for many years, making it easier to trust the activities and, for example, the duty of confidentiality. The following quote describes building trust through employee selection:

*There has been kind of a ready-made selection of employees, and applicants who are already well-known in the communities, preferably in as positive a way as possible, of course, and as someone who builds the community, have stood out nicely. Naturally, this is a tool for getting involved in people's lives -- when the bridge already exists and you have already gained that trust. You don't start building it in the encounter or wonder when you will reach a situation where you can really get to grips with that person's issues and situation; on the contrary, we hear it right from the start, sometimes even a little too much.*

ANNE HAMMAD, DEACONESS FOUNDATION

The third sector operators often also brought up the importance of first reception for finding services. For example, there are variations between different parishes in how well undocumented persons have found diaconial work to seek help and how these places view helping undocumented persons. When the client feels that they have received help and been heard, the information spreads to the networks and, at the same time, the parish employees know how to help other undocumented clients even better. However, the challenge is seen to be that, in many situations, the undocumented person would need very concrete support for accessing services, such as someone who speaks their native language and Finnish to accompany them to social welfare and healthcare appointments to ensure that they obtain services, but no entity seems to have sufficient resources for this. The great importance of the receiving employee in healthcare raises concerns among the interviewees:

*In a sense, whether you are undocumented or not, the most difficult part in health services is when you go in there and the reception -- if you can get over that hurdle, the ball usually starts rolling. But if the reception stops at the fact that you do not have a social security number and you are classified as a person who cannot receive services here, then the game is lost. These things shouldn't even happen. This is where it culminates, whether it's a maternity and child health clinic, a midwife or a healthcare appointment booking point, that's the hard part. Can you move on from that?*

MISKA KESKINEN, FINNISH RED CROSS

One familiar challenge for undocumented persons in accessing services is the difficulty of identification without a personal identity code, as mentioned in the previous quote. Identification can also be difficult because public services create artificial personal identity codes for undocumented persons, which work only in that organisation. Based on the data, the bodies that offer advice to undocumented persons often find themselves in situations where they have to act on behalf of the families and help, for example, healthcare professionals create artificial IDs for their clients. Based on previous research, it may also depend on the skills of the individual employee whether they can create such an ID for the client.<sup>20</sup> One challenge that has emerged is also that the same person can unknowingly have several IDs in the same system, which complicates healthcare, among other things.



<sup>20</sup> Katisko, Annala et al. 2023, 69

In general, based on the data, social and health services are associated with a huge number of situations where employees do not know what services they should be offering to undocumented clients. There is also concern that if an undocumented person has various special needs due to, for example, disability, it becomes even more difficult to obtain the right kind of services. There are still no service paths in many areas, or employees do not have information about them. The legislation also leaves much room for interpretation as to which services are necessary or urgent, or when it is considered that a parent needs to be cared for so that the child's best interests are not jeopardised. The following excerpt describes how hard the third sector operators interviewed have to demand the services that the undocumented persons they support are entitled to, and even then they may not receive the care they need.

*I explained at the reception that I actually called the chief physician and, using their words, asked the person to look on the computer, in a programme called this and this, that there are instructions there on what you should do, but they did not look. No services, but then we called to give things a push and managed to get access, though even then they only gave the diabetes medication, but no blood sugar meter, for example. What good are the pills if you can't measure whether the pills have worked? So, in a way, that necessary healthcare was cut short again. Just being told to go somewhere else.*

MISKA KESKINEN, FINNISH RED CROSS

Seeking health services is also complicated by the fact that, in the Turku region, the client may still receive a bill for the use of services, perhaps even at the price of an out-of-town resident. The fear of a bill means that people do not necessarily dare to seek the services if it is not possible for them to pay the bill. The interviewed operators have instructed undocumented families to apply for their bills to be adjusted or for billing to be waived, but this is not yet automatic in the Turku region. If an undocumented person receives bills from healthcare and they pile up in enforcement, a possible residence permit means that those bills will be transferred to be paid by that person:

*We have had clients who have used health services when they were undocumented, received a bill for those services and, once they have obtained a residence permit, those debts are waiting for them in enforcement. So, is that reasonable or not? Of course it's not reasonable.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.

In terms of services, what causes challenges for undocumented persons is particularly the variation in their status, which we described in the introduction as well. When the situation changes quickly due to decisions made by the Immigration Service or the court, families should know what services they are entitled to at any given time and whether any services that have been available to them with another residence status will now be interrupted. The interview excerpt below describes this reality in which many undocumented persons live:

*It's so fast: we have situations where a person is still an asylum seeker today, perhaps in their third round. Tomorrow, a negative decision comes from the Immigration Service. This means that tomorrow they are undocumented because they have an enforceable denial of admittance or stay. They are suddenly outside of all services and entitled only to services for the undocumented. Then, in two months, if the administrative court prohibits enforcement, their rights will be temporarily restored until the administrative court resolves the matter. We have people who are in this kind of constant motion.*

SANNA VALTONEN, TURVAPAIKANHAKIJOIDEN TUKI RY – SUPPORT FOR ASYLUM SEEKERS

By far the most common way of finding services aimed directly at undocumented persons is through the families' own networks and the grapevine. In the survey as well, the families responded that they most often received information about services from friends. In the interviews, the cooperation between the operators providing services and, for example, reception centres, wellbeing services counties, municipalities and other third sector operators is described as good, which facilitates the flow of information and the guiding of clients to the rights services. Advertising has not really been necessary to find clients, although some services and activities have been promoted on Facebook and WhatsApp as well as using paper flyers, for example. Some operators said that rather than advertising, they have to actively limit the number of clients for financial reasons.

The importance of networks and friends as a source of information also indicates that it can be difficult to obtain sufficient guidance and advice from elsewhere. It may also be the case that those with weak networks do not receive information about services at all. The information passed down in networks is also seen as a challenge in terms of access to services and the fulfilment of rights, as the third sector representatives interviewed feel that incorrect information coming from these networks may undercut advice based on correct information. For instance, there is a lot of mistrust in child welfare services, which spreads to large groups of people through the grapevine. This is problematic because being a client of child welfare services is often a requirement for an undocumented child to get a place in daycare, for example.<sup>21</sup>

The requirement of being a client of child welfare services to access services is criticised several times in the interview material. Being a client of child welfare services is generally required to access early childhood education and care, even though, according to the Prime Minister's Office's report, early childhood education and care would be necessary especially for undocumented children whose parents often already have a lot of stress and difficulties in ensuring their children's balanced development and normal childhood due to their undocumented status<sup>22</sup>. The requirement of a child welfare assessment in order to enter early childhood education and care, combined with the aforementioned fears that undocumented persons often have in relation to child welfare services, makes it particularly difficult for undocumented children to access early childhood education and care. At the same time, there is also a risk that the importance of an individual social worker in terms of the child's life becomes emphasised in this regard. According to the interviewees, you still have to fight for an undocumented family to be

21 This is discussed in more detail in chapter 3 of this report.

22 Katisko, Annala et al. 2023, 47

accepted as a client of the wellbeing services county's child welfare services, even though they do not have municipal resident status. In the survey produced for Arabic-speaking undocumented or previously undocumented families, it was asked if they felt that they had been left without necessary services. Many of the responses specifically mentioned how the families would have needed places in daycare, but had not been able to obtain them for their children. The necessity of being a client of child welfare services for essential services for children is criticised in the report data, for example, as follows:

*When child welfare services are activated for undocumented families, they then get better services that support the family more. In my view, it is a systemic error somehow that it is the minimum services that cause the child welfare intervention. There should be sufficient services in the first place.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.

### **Poverty prevents children from undocumented families from living a normal childhood**

Organisations working with undocumented persons have found many factors in undocumented families that endanger the children's chance of living a normal childhood. Many of these relate to a lack of means, as undocumented families usually have to get by on extremely limited means, mainly payment commitments issued by the Social Insurance Institution of Finland. The payment commitments are only good for a specific shop and they are limited to food and hygiene items. For children, this means not being able to buy anything else. The interviewees bring up, for instance, situations in which children have lamented the fact that they can never buy "stuff", meaning toys and things that children normally have, like other children. The excerpt below describes the impact of a lack of means on children.

*The material need is considerable. There are a million examples, but perhaps the most heart-rending one that comes to mind is, in the summer, when a young mother wanted to buy an ice cream cone from a stall for her child, she couldn't because she didn't have cash. The payment commitment is tied to hygiene items and food, so it can't possibly enable that kind of -- stimulation of any kind, no toys, anything that children need.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.

Under the UN Convention on the Rights of the Child, children have the right to play and leisure. Children who live in Finland usually get to experience things in their free time that require at least some money. Most children get to go to the cinema or an amusement park or to travel at least once in a while. Children from undocumented families do not have money for such things, and the lack of a residence permit also prevents

them from travelling outside of Finland. These things can create a strong feeling of being an outsider. Children’s and young people’s experiences of being low-income have been mapped in Save the Children Finland’s annual Children’s Voice survey. Based on the results of the 2023 survey, being low-income causes children and young people to feel like an outsider and different and, therefore, it also affects friendships and increases the risk of being bullied or experiencing loneliness.<sup>23</sup> The provision of leisure activities and experiences is often not considered as necessary as food and hygiene items, which is something that children themselves may disagree with:



*When you view, for example, the theatre and the amusement park as experiences, they are not necessary; but they are for a child. If their friends have been somewhere, it might be that they are the only one who doesn't go anywhere. The parents don't really have any money at all and that small amount is only meant for food.*

SAMIRA EL FAOUKI, BLUE RIBBON FOUNDATION

Third sector operators have tried to support undocumented children’s access to hobbies, because hobbies are something that these children often lack. The lack of a personal identity code, as discussed hereinabove, is a challenge in terms of hobbies as well because one is required, for example, for insurance in sports hobbies. Although there are some free hobbies offered at schools, for some reason undocumented families do not get information about them very easily. The interviewees also bring up that some of the families feel the need to protect their children a little too much, in which case the children may not get to participate in the free hobbies either. This overprotection is linked to a lack of knowledge about Finnish society as well as what the families see as being good and necessary for children, or in the child’s best interests.

As mentioned earlier in this report, all who are residing in Finland have the right to receive indispensable subsistence and care, which also includes housing. Housing for undocumented persons is still implemented in very different ways in different municipalities. Based on the report data, things are quite good in Helsinki and Turku and undocumented families are usually able to live in a regular dwelling for the duration of their undocumented status. On the other hand, the interviewees have observed major shortcomings in the implementation of accommodation in some other localities. In some municipalities, emergency accommodation is not organised even though undocumented persons have the right to it based on the law. In some cases, even families with children have been placed in emergency accommodation, where they have been kept in a constant state of uncertainty about whether the accommodation will continue:

*At worst, they keep telling you that you can stay for three days and then you have to leave, even though after the three days, it is extended for another three days. There is a constant fear that in three days, you will really have to leave.*

MINNA ILJANKA, TURKU CENTRE FOR SOCIAL WORK OF THE CHURCH

23 Save the Children Finland 2023



A lack of means also results in many undocumented persons having to work in the grey labour market to get by. According to a report by the Deaconess Foundation, the range of sectors employing undocumented persons has become more diversified in recent years.<sup>24</sup> The bodies interviewed for this report said that such jobs can be found in various low-wage service industries, among others. Jobs in the grey economy pose a high risk of exploitation and extortion of the employee by threatening to report them. For want of cash, undocumented people may be forced to accept, for example, inhuman working conditions or unfair wages. The parents' poor working conditions, insufficient pay and the fear of being caught affect the well-being of the whole family, including the children.

### Knowledge and understanding of the situation and rights of undocumented families is lacking

Based on the data, a lack of knowledge about being undocumented hinders the realisation of services for undocumented persons. Both service providers and undocumented people themselves have been noted to have gaps in their knowledge on the matter. For example, in the daycare world, cooperation between home and daycare can be challenging because the staff may not even know that a client family is undocumented. If the child lacks the right kind of supplies and clothing, for example, the daycare may react to this in the same way as for other families, even though, due to financial constraints, it can be considerably more difficult for undocumented families to acquire supplies for things such as rapidly changing outdoor weather. Anna Hammad, Project Manager at the Deaconess Foundation, describes the situation as follows:

*In today's high-pressure daycare world, their ability to respond to these things and these families is not necessarily working. They understandably -- look at all families the same way and then are surprised when these children don't have the clothes, the materials and the equipment, no this and no that.*

Undocumented persons have been found to need more support than is currently available also for going to school and for the cooperation between home and school. The conditions at the children's home may make going to school challenging if the children lack, for example, a regular rhythm of life suitable for school as well as a quiet space to do schoolwork. Some third sector operators have tried to respond to this need by organising activities where employees and volunteers support children in doing their homework. The school and the teachers, on the other hand, do not necessarily know about the family's situation, which means that the child may not receive the support needed to perform at school. The possible challenges of going to school for children living in a reception centre, for example, are described below:

*Also, there are huge deficiencies in how we support the school attendance of undocumented children. -- And also for children who are in that limbo, if those children live, for example, in a reception centre -- you can't rest when you want or eat when you want there.*

<sup>24</sup> Leppäkorpi, Mervi & Koivisto, Johanna 2024



*There, you live in the rhythm of the reception centre, which does not necessarily support going to school at all. There's no quiet space there. Then if the teachers don't know, and how would they know, unless the child has some special services, then how would that teacher know what kind of conditions this child lives in. We are missing a link between home and school.*

TURVAPAIKANHAKIJOIDEN TUKI RY – SUPPORT FOR ASYLUM SEEKERS

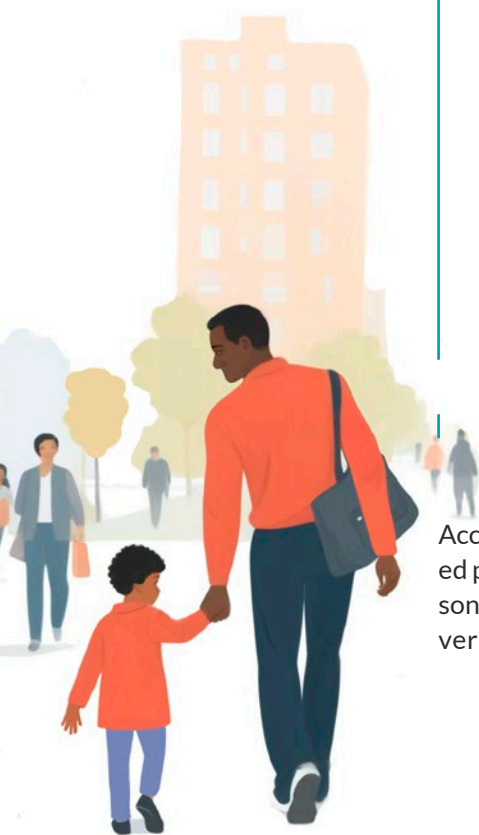
The challenges in going to school are also linked to the fear of child welfare services discussed earlier in this report. The interviewed experts have found that some parents may, for example, hide problems related to school attendance or the child's psychological symptoms from the school staff. This is seen to be connected to the families in question feeling pressure for their child to perform well enough and without problems at school. The role of the school and child welfare as, above all, entities that support children's well-being is not necessarily known, in which case any challenges getting revealed are seen as a threat to the family.

Child welfare workers have often also been found to lack understanding and knowledge about the conditions of undocumented families. Prejudice has been observed against the families and, viewed through the lens of this prejudice, the parents may be seen to be deliberately acting incorrectly, for example. The conditions caused by being undocumented, such as the parents' stress and need for support, are not necessarily understood. Misunderstandings can happen on both sides, but the interviewees see these as a risk to the realisation of the child's best interests, especially in child welfare services, because an individual social worker has power that comes with their official position in the situation:

*I have to have conversations to kindly remind those child welfare workers -- that, as a rule, the parents are not doing those things on purpose. From their starting points, it is difficult to understand how we live and are in Finland. Often there are quite literally two worlds pitted against each other, and as we know, antagonism very easily leads to misunderstandings. Then, when we talk about the realisation of the child's best interests, that antagonism combined with differing views, values and attitudes makes the power structure dangerous. [--] And at worst, it can be harmful to the child if the child's best interests are not pursued in a fully selfless, humane and complete way. And those stories are sad.*

ANNE HAMMAD, DEACONESS FOUNDATION

According to the experts, mental health is something in support of which undocumented persons receive far too few services. The interviewees say that undocumented persons have received help mostly from volunteer psychologists, but their resources are very limited, so long-term psychotherapy, for example, is not available. A lack of



language skills and the need for an interpreter often also pose challenges for the treatment of mental health problems. In order to process trauma, for example, the client should have the same interpreter during every session and trust must first be built between the client and the interpreter. The parents' possible untreated mental health problems are naturally also reflected in the children, but the children do not get enough help for their own traumas either:

*You can see it in the families that arrived in 2015, that if they have children who were like, 4 to 5 years old when they came, and they remember events from their home country and things that happened during their journey to some extent and are perhaps already traumatised as a result, those things have then never been processed and treated here because, 9 years later, they are still undocumented.*

MINNA ILJANKA, TURKU CENTRE FOR SOCIAL WORK OF THE CHURCH

In addition to the need for mental health services, there is also a need for parenting support. In the experts' view, the parents of undocumented families would need more support in coping with the day-to-day in their uncertain, stressful and even scary life situation so that they would be better able to maintain security and routines for their children. Efforts have been made to respond to the need for parenting support in both Turku and Helsinki by developing third sector services aimed specifically at undocumented families with children. Knowledge gaps related to parenting during integration more generally also come up in the interviews. Families may be left without sufficient information about how parenting is done in Finland:

*We forget, for example, to support the parents in parenting when it is needed, such as explaining our system and what things are thought to be the parent's responsibility in Finland. They are completely different things than in the country of origin of many undocumented persons. We don't provide that kind of in-depth support for how things work here. Things then go well for some despite this and for some, it is a complete disaster.*

SANNA VALTONEN, TURVAPAIKANHAKIJOIDEN TUKI RY- SUPPORT FOR ASYLUM SEEKERS

The priority of the child's best interests often comes up in discussions, both when discussing services and how families have ended up undocumented. Pursuant to the UN Convention on the Rights of the Child, the best interests of the child should always be considered in actions concerning children. For example, in residence permit decisions, it is important to exercise broader overall consideration, as a result of which it may be possible for a child or their family members to obtain a residence permit. Despite this, the interviewees have come across cases where a child's family member has been left without a residence permit on the grounds of, for example, an evasion of provisions on entry. A child should always be seen as a child and their best interests as paramount in

all decisions and services:

*Of course, it's always the child's best interests that should regulate these things and determine the services they receive. A child is a child, not an undocumented person, and the child's safe growth and environment to grow up in must be ensured.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.

### The future worries especially children and young people from undocumented families

The interviewees feel that services for undocumented persons as well as access to them have progressed in both Helsinki and Turku in recent years. In both regions, third sector operators have participated in the development of the services in cooperation with the municipalities and wellbeing services counties. Although the operators recognise that the situation is improving, even with this report it has become clear that there is still a lot to do. Sanna Valtonen, an expert from Turvapaikanhakijoiden tuki ry – Support for asylum seekers, describes the previous situation as a free fall, which has been brought to a halt, at least to some extent, in recent years:

*Basically, families get help better and it no longer takes two years to organise places in school for the children. It's not that kind of terrible mess anymore, rather things work out quite nicely and many organisations are doing their own good work. I feel that these people are in some kind of a safety net somehow and not in free fall, as they were a few years ago.*

In the responses to the survey for families who are or have been undocumented conducted for this report, the parents brought up various views on the future. One of the respondents feels that the services for families with children have improved and believes that they will continue to improve. Many believe that the services for undocumented families with children will remain the same because, in their opinion, nothing has changed for the better in the past 8 to 9 years. Some believe that the situation will worsen, which they justified by the economic and political situation.

The interviewed experts have different experiences of how undocumented persons themselves relate to the current political climate and plans affecting the lives of undocumented persons in Finland. Some of the experts consider that the situation of the undocumented is already so strained that they do not have the capacity to find out about and understand the possible future changes. Some, on the other hand, have noticed great concern among undocumented persons. The experts are especially worried about children and young people from undocumented families who have lived in Finland for a long time, because, for many of them, Finland and Finnish society are the only ones they know:

*We still have a lot of them here who arrived in 2015 and who are still in the process and have been for nine years already. They may have come here as little children and been in daycare and preschool and school while on the asylum merry-go-around, without any guarantee that they will be able to stay here. They haven't been able to participate in any normal activities with their friends; if there's a field trip cruise, they can't go along. These children and young people have grown up here and attended a Finnish school, they know how to look for information. They are extremely worried.*

MINNA ILJANKA, TURKU CENTRE FOR SOCIAL WORK OF THE CHURCH

The experts themselves have quite a lot of concerns about the future of undocumented persons in Finland. They bring up, for example, the plans recorded in the Government Programme to remove obstacles to the exchange of information between authorities to enforce repatriations<sup>25</sup>. The experts are concerned about what these changes could actually be and which authorities they would apply to. There are fears that in the worst case scenario, the change will dismantle all services that have thus far been offered to undocumented individuals without them having to worry about being reported to the police or immigration authorities. According to the interviewed experts, removing the duty of confidentiality also from social welfare and healthcare would exclude undocumented persons from these services and make it impossible to ensure the indispensable subsistence and care in accordance with the Constitution.

Concerns are also raised about an increase in undocumented persons: for example, those with shorter residence permits should know to renew their residence permit at just the right time, but there is very little help available for the renewal of residence permits. People may therefore end up undocumented by accident or as a result of the system, as was the case in 2016 when some who previously received humanitarian protection did not know to apply for a work-related residence permit, to which they may have been entitled. Third sector operators have also succeeded in helping many undocumented persons out of being undocumented, e.g. through a work-related residence permit. The Government's plans to eliminate the so-called "lane change", i.e. the possibility of those who have been in the asylum process or who have a study visa to apply for a work-related residence permit, may lead to an increasing number of undocumented persons in Finland who find it even more difficult to legalise their residence. The interviewed experts are of the view that instead of creating more undocumented persons, efforts should be made to enable those who have already lived in the country for a long time to obtain a residence permit and become a part of society.

The experts are concerned about the polarisation of society as a wider phenomenon as well, that is, that some people see immigration as a whole as a threat, while others view it positively. The change in political rhetoric to a more inhumane direction is also worrying, examples of which include the aforementioned "lane change", the use of the term "anchor child" in the Government's proposal and increased talk of "illegality" in relation to undocumented persons. In relation to the polarisation of the climate of opinion, there is also concern that some people have lost their trust in Finland as a fair country after seeing how undocumented persons, among others, have been treated.

<sup>25</sup> Programme of Prime Minister Petteri Orpo's Government

At worst, disappointment with the state's actions causes fatigue, which further reduces the number of actors and volunteers supporting undocumented persons:

*I have had several people call me to say that they are terribly upset that the Finnish legal system is like this, that they had imagined that these people they meet, who tell them about very traumatic things, that, of course, there is justice in Finland, this is a civilised country and these people will be granted asylum. Then to realise that that's not the case, that can easily burn a person out, even the person who is helping.*

ULLA SIIRTO, KIRKKOHALLITUS

A lot of feelings of injustice have been observed among undocumented persons also regarding how, in recent years, the treatment of Ukrainians in Finland has differed so radically from how refugees and asylum seekers from everywhere else are treated. The experts are worried about the increase in inequality between different immigrant groups. This obvious disparity has brought out in a painful way how, in practice, everyone is not recognised to have equal human dignity in Finland:

*When asylum seeking is being restricted at the EU level while welcoming Ukrainians, it does cause quite a lot of the same feelings of unfairness and despair in these other people who have fled, they wonder why their plight is not recognised when the plight of others can be responded to with an EU-level decision.*

MINNA SAUNDERS, TURUN VALKONAUHA RY.





## 6 CONCLUSIONS

This report has examined what services undocumented children and families are entitled to and how these services are realised in practice, how the children and families find and access the services as well as what kind of services they would need more of. In addition, thoughts have been compiled as to the future of the existing services.

Undocumented families face numerous systemic challenges that hinder their access to the public services and support they need. These include, among other things, a lack of trust in public services, challenges related to language skills and a lack of knowledge about their rights and the available services. Information about services mainly travels through networks in their native languages only, resulting in a high risk of misinformation, such as the spread of misconceptions about the actions of child welfare services, for example. Accessing services comes with many thresholds due to which the service may not be obtained at all. Should an undocumented person find information about services and dare to trust the entity offering the service, as well as being ready to deal with the bill that may come after, even a statutory service may be prevented due to the attitude or lack of knowledge of the receiving individual employee.

The guidance and advice provided by third sector operators is key to accessing services for many undocumented families. The third sector operators have succeeded in building trust among undocumented families by means of, for example, the employees' versatile language skills and inside knowledge of the communities. Concrete support for accessing services would be necessary, but there are insufficient resources for this.

A lack of means limits children's lives significantly and is a key obstacle to the normal childhood and fulfilment of the rights of the child of children from undocumented families. The children do not get to experience the same things as other children. Their opportunities to leisure activities are limited, which can create a strong feeling of being an outsider and negatively affect friendships. Housing conditions vary depending on the locality – in some cases, even families with children have to live in uncertainty and may have difficulty accessing adequate emergency accommodation. Working in the grey labour market may expose the parents of the families to exploitation and inhuman working conditions, which also affects the children of the families.

Based on the report, it is clear that both service providers and undocumented families themselves have gaps in their knowledge and understanding with regard to the overall impact of being undocumented on life as well as the rights of undocumented persons to services. There have been situations in, for example, schools, daycares and child welfare services where better knowledge and understanding of being undocumented would have been needed. Schools have not always been aware of the families' situations and have therefore not been able to offer adequate support. The parents would also need more support, for example, in maintaining everyday routines and creating a safe environment for the children to grow up in. The child's best interests should be primary in all actions and decisions concerning the child, even though being undocumented makes the situations of the families complicated.

The interviewees feel that services for undocumented persons as well as their accessibility have progressed in both Helsinki and Turku. The participation of third sector operators in the development of the services in cooperation with the authorities has been seen as a positive thing. Although the situation has improved, the report shows that there is still a lot to do. The political plans and possible changes related to the situation of undocumented persons raise concerns among both the undocumented families and experts. The possible removal of obstacles to the exchange of information between authorities and changes in residence permit practices, for example, create uncertainty and fear that the situation of undocumented persons may deteriorate even further. In addition, the polarisation of society and experiences of inequality between different immigrant groups worry the experts.



# 7 RECOMMENDATIONS TO DECISION-MAKERS AND PROFESSIONALS

## 1 The best interests of the child must be the primary consideration in all actions and decisions concerning undocumented children.

The UN Convention on the Rights of the Child prohibits any kind of discrimination related to the child's or their guardian's characteristics, actions or status (Article 2), which can be considered to also include being undocumented. Pursuant to the Convention, the best interests of the child must be considered in actions concerning children (Article 3). Under the Convention, the state has an obligation to protect children who are seeking or who have been granted refugee status and to ensure the fulfilment of their rights. Numerous articles of the Convention on the Rights of the Child ensure that all children have access to various activities and services essential to the child's development and well-being, such as registration (Article 7), information (Article 17), healthcare (Article 24), social security and an adequate standard of living (Articles 26 and 27), education (Article 28), leisure as well as artistic and cultural life (Article 31).

## 2 Undocumented families with children must have access to necessary health services.

Undocumented persons always have the right to urgent healthcare. The right to some non-urgent but necessary health services was added to the Act on Organising Healthcare and Social Welfare Services during the previous government term. According to the Government Programme of the current Government, this decision is proposed to be repealed. These services include, for example, maternity and child health clinic services related to pregnancy and childbirth, contraceptive services and termination of pregnancy, the elimination of which would especially affect families with children. Even the current legislation leaves much room for interpretation as to which services are necessary or urgent, or when it is considered that a parent needs to be cared for so that the child's best interests are not jeopardised.

## 3 Obtaining basic needs, such as housing, indispensable subsistence or care, should not be specific to the wellbeing services county; instead, it must be ensured for all children and their families regardless of their place of residence and status.

In many places in Finland, undocumented persons receive help with their basic needs mainly from the third sector. Basic social rights, such as the right to housing, belong to everyone residing in Finland under the Constitution and international human rights treaties (e.g. Finnish Treaty Series 6/1976, 18-19/1990, 85-86/1998). The right to receive indispensable subsistence and care is defined in the Constitution of Finland. However, the wellbeing services counties have the right to decide on the services they offer, as a result of which the fulfilment of the basic needs of undocumented persons varies greatly from region to region.

**4 Undocumented children must have a genuine opportunity to access early childhood education and care.**

For many undocumented children, early childhood education and care is a particularly important service that promotes the well-being of the child and the family. According to the Prime Minister’s Office’s report, the access of undocumented children to early childhood education and care is poorly realised in Finland and often requires active efforts and involvement from social services and the third sector, such as the determination from child welfare services that early childhood education and care is necessary for the child in question. Some municipalities in Finland have refused to organise early childhood education and care for undocumented children, citing the lack of a statutory obligation. However, there is a statutory obligation, and under the Act on Early Childhood Education and Care, municipalities have an obligation to organise early childhood education and care also for children staying in the municipality who are not municipal residents “in urgent cases and if circumstances otherwise so require” (Finnish Treaty Series 540/2018).

**5 Children must have the opportunity to pursue a hobby and participate in activities with other children.**

A lack of means is a key obstacle to the normal childhood of children from undocumented families. If the family has no cash at their disposal because they receive all support in the form of e.g. payment commitments, the opportunities for leisure activities, some hobbies and, for example, participation in field trips or friends’ birthdays are limited, which can cause a strong feeling of being an outsider and affect the child’s friendships. The lack of a personal identity code should also not be an obstacle to pursuing a hobby, which it currently is for some.

**6 It is important to have parenting and mental health support services available for the parents of undocumented families.**

There is very little support for mental health available to undocumented families. The parents’ possible untreated mental health problems also affect the children, who may exhibit symptoms themselves due to the exceptional situation. The parents of undocumented families need support in coping with the day-to-day in their uncertain, stressful and scary life situation so that they are better able to maintain security and routines for their children as well as support their children’s well-being and growth. The families usually also need information about how to be a parent in Finland.

**7 Means for informing undocumented children and families about services must be developed.**

By far the most common way that undocumented families find services aimed directly at undocumented persons is through the families’ own networks and through word of mouth. Obtaining information about services can be difficult otherwise. The family may not know what services they are entitled to when looking for them or, in some cases, families have a lack of trust in public services despite there being a duty of confidentiality in social welfare and healthcare. For example, a lack of knowledge about the right to go to school or the fear of being reported to the police can prevent undocumented children from applying for basic education. Families with weak networks may not receive information about services at all. Misinformation can also spread quickly through word of mouth and networks.





**8 The knowledge and competence of service providers in offering services to undocumented children and families must be developed through cooperation and training, among other means.**

Many service providers have gaps in their knowledge and understanding with regard to the overall impact of being undocumented on life as well as the rights of undocumented persons to services. In social and health services, employees may not always know what services they should be offering to undocumented clients. Service providers also do not always understand the conditions caused by being undocumented, the parents' stress and need for support. Should an undocumented person find information about services and dare to trust the entity offering the service, obtaining the service may still be prevented due to the attitude or lack of knowledge of the employee. In recent years, cooperation between third sector operators and authorities has been found to be beneficial in the development of services for undocumented persons.

**9 Undocumented children and families must continue to be able to use essential services without the fear of being reported.**

The current Government Programme includes plans to remove obstacles to the exchange of information to enforce repatriations. According to the experts interviewed for the report, the planned change could, at worst, do away with the services that have thus far been possible to offer to undocumented individuals without them having to worry about being reported to the police or immigration authorities. Removing the duty of confidentiality from social welfare and healthcare, for example, would likely exclude undocumented persons from these services and make it impossible to ensure the indispensable subsistence and care in accordance with the Constitution.

**10 Instead of creating more undocumented persons, we must find ways for those who have lived in the country for a long time to become a part of society.**

The polarisation of society and the change in political rhetoric to emphasise the threats posed by refugees and immigration worry undocumented families and the professionals who work with them. The increase in inequality also between different immigrant groups is a concerning trend. The current Government's plans to eliminate the so-called "lane change", i.e. the possibility of those who have been in the asylum process or who have a study visa to apply for a work-related residence permit, may lead to an increasing number of undocumented persons in Finland who find it even more difficult to legalise their residence. Instead of creating more undocumented persons, efforts should be made to enable those who have lived in the country for a long time to legalise their residence and integrate into society.



## SOURCES

- Diakonissalaitos (29.3.2019, modified 3/2023) Paperittomia on Suomessa entistä enemmän ja uutena ilmiönä on kasvanut lapsiperheiden määrä. Available at <https://www.hdl.fi/blog/paperittomia-on-suomessa-entista-enemman-ja-uutena-ilmiona-on-kasvanut-lapsiperheiden-maara/>. [Cited 15.3.2024.]
- Katisko, Marja; Annala, Iiris; Kalm-Akubardia, Maija; Kynsilehto, Anitta; Marucco, Camilla; Pehkonen-Elmi, Tuula; Viljanen, Katariina (2023) Paperittomien henkilöiden sosiaaliset oikeudet Suomessa. Valtioneuvoston selvitys- ja tutkimustoiminnan julkaisusarja 2023:6. Available at: [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164606/VNTEAS\\_2023\\_6.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164606/VNTEAS_2023_6.pdf?sequence=1&isAllowed=y).
- Leppäkorpi, Mervi & Koivisto, Johanna (2024, forthcoming) Diakonissalaitoksen selvitys paperittomien palveluista.
- Lindroos, Meeri (27.5.2020) Jokaisella lapsella pitäisi olla oikeus suorittaa perusopetus loppuun. Lastensuojelun Keskusliiton blogi. Available at: <https://www.lskl.fi/blog/jokaisella-lapsella-pitaisi-olla-oikeus-suorittaa-perusopetus-loppuun/>. [Cited 4.5.2024.]
- Maahanmuuttovirasto (2018) Maahanmuuttoviraston selvitys sisäministerille turvapaikkapäätöksentekoon ja -menettelyyn liittyen. Available at: [https://migri.fi/documents/5202425/8701378/Maahanmuuttoviraston+selvitys+-sis%25C3%25A4ministerille+turvapaikkap%25C3%25A4%25C3%25A4t%25C3%25B6ksentekoon\\_valmis.pdf](https://migri.fi/documents/5202425/8701378/Maahanmuuttoviraston+selvitys+-sis%25C3%25A4ministerille+turvapaikkap%25C3%25A4%25C3%25A4t%25C3%25B6ksentekoon_valmis.pdf)
- Niskanen, Maaro (2023) Paperittomat vanhempina Suomessa. Pro gradu- tutkielma Tampereen yliopistossa.
- Pakolaisapu.fi. Paperittomuus. Available at: <https://pakolaisapu.fi/paperittomuus/#:~:~text=Paperittomien%20tarkkaa%20m%C3%A4%C3%A4r%C3%A4r%C3%A4%C3%A4%20ei%20tiedet%C3%A4,paperittoman%20kaltaisessa%20tilanteessa%20olevaa%20henkil%C3%B6%C3%A4>. [Cited 15.3.2024.]
- Pelastakaa Lapset ry. (2023) Vinberg, Johanna. Lapsen ääni 2023: "Tuntuu, että on niin erilainen kaikista" – Lasten kokemuksia pienituloisuudesta.
- Pääministeri Petteri Orpon hallituksen ohjelma, 10.3 Maahanmuutto- ja kotoutumispolitiikka. Available at : <https://valtioneuvosto.fi/hallitukset/hallitusohjelma#/10/3> [Cited 26.3.2024.]
- Saaranen-Kauppinen, Anita & Puusniekka, Anna (2006) KvaliMOTV - Menetelmäopetuksen tietovaranto, 6.2.3 Yleistäminen. Tampere: Yhteiskuntatieteellinen tietoarkisto. <https://www.fsd.tuni.fi/menetelmaopetus/>. [Cited 18.3.2024.]
- Sisäministeriö (2022) Selvitys mahdollisista kansallisista ratkaisuista maassa ilman oleskeluoikeutta olevien tilanteeseen. Sisäministeriön julkaisuja 2022:16 [https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163827/SM\\_2022\\_16.pdf?sequence=1&isAllowed=y](https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163827/SM_2022_16.pdf?sequence=1&isAllowed=y)
- Sosiaali- ja terveysministeriö, Paperittomien terveydenhuolto. Available at: <https://stm.fi/paperittomien-terveydenhuolto>. [Cited 15.3.2024.]
- Toivanen, Olli-Pekka (3.8.2023) Hallitus on rajoittamassa paperittomien oikeutta välttämättömään terveydenhuoltoon – Helsingissä lakimuutos ei välttämättä vaikuttaisi. Haettu osoitteesta <https://yle.fi/a/74-20043609>. [Viitattu 15.3.2024.]
- Turun Valkonauha ry (2022) Bäckman, Linda & Iljanka, Minna. Paperittomien palvelut Turussa. Available at: <https://www.kaikkiennaistentalo.fi/wp-content/uploads/2023/02/Paperittomien-palvelut-Turussa.pdf>. [Cited 26.3.2024.]
- Yleissopimus lapsen oikeuksista, 20.11.1989. [https://www.finlex.fi/fi/sopimukset/sopviite/1991/19910059?sopviite\\_id=19910059](https://www.finlex.fi/fi/sopimukset/sopviite/1991/19910059?sopviite_id=19910059) [Cited 15.3.2024.]



Save the Children is the world's leading independent organisation for children and an expert in child protection.

We safeguard every child's right to life, protection, learning and participation in Finland and globally. We have more than a hundred years of experience in promoting children's rights.

We bring children and adults together to build a better future for good. Because children's future starts now.

---

## **Pelastakaa Lapset**

Koskelantie 38  
00610 Helsinki  
tel. +358 10 843 5000

[pelastakaalapset.fi](https://pelastakaalapset.fi)

