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Office of the United Nations High Commissioner for Human Rights

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## Joint questionnaire by Special Procedure mandate holders on Covid-19

## Submission by the Finnish NHRI (Human Rights Centre)

This is the submission of the Finnish Human Rights Centre (NHRI) for the joint questionnaire by Special Procedure mandate holders on Covid-19.

The submission will focus specifically on the first common question on accountability and justice: “*Could you kindly highlight key concerns in complaints received by national human rights institutions, ombudspersons, anti-discrimination bodies in relation to the COVID-19 crises and how they have been addressed*?”

The submission will include key concerns and information based on the work of the Finnish NHRI, and the work of the Chancellor of Justice, Ombudsman for Children, Non-discrimination Ombudsman and Ombudsman for Equality.

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| ***The Finnish Human Rights Center*** (HRC) is an autonomous and independent expert institution whose task is to promote and monitor the implementation of fundamental and human rights in Finland as well as to increase cooperation and exchange of information between various actors in the field. According to its founding legislation, one of the tasks of the HRC is to participate in European and international cooperation related to the promotion and protection of fundamental and human rights. The Human Rights Centre does not handle complaints or other individual cases.  ***The HRC represents the Finnish NHRI in international NHRI cooperation. The HRC forms the National Human Rights Institution (NHRI), alongside with its pluralistic 38-member Human Rights Delegation and the Parliamentary Ombudsman.***  The National Human Rights Institution in Finland was established by law in 2012, and received **A-status in 2014 and 2019.** |

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**Joint questionnaire by Special Procedure mandate holders**

**Submission by the Finnish National Human Rights Institution (including information from the other independent ombudsmen)**

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# General on COVID-19 related measures in Finland

On the 16th of March 2020, the Government of Finland together with the President of the Republic declared that Finland is in a state of emergency due to the COVID-19 virus.

As a result, the Government submitted the commissioning and implementing decrees on the [Emergency Powers Act (Valmiuslaki, 29.12.2011/1552)](https://www.finlex.fi/fi/laki/ajantasa/2011/20111552), to Parliament. The Parliament approved the commissioning of the Emergency Powers Act on 18 March 2020.

The purpose of the Emergency Powers Act is to secure the livelihood of the population and the national economy, to maintain legal order, to maintain constitutional and human rights and safeguard territorial integrity and independence of Finland in emergency situations. It legislates the state authorities’ preparation to state of emergency as well as the authorities’ powers during a state of emergency.

The implementing decrees included, for example, sections on

* the functioning and protection of health care and social welfare units,
* derogations from the terms and conditions of employment relationships,
* suspension of education and
* restricting the sale of medicines, goods and services used in health care services nationally.[[1]](#footnote-1)

Since then, many restriction measures have been implemented under the Emergency Powers Act, the [Communicable Diseases Ac (Tartuntatautilaki, 21.12.2016/1227)](https://www.finlex.fi/en/laki/kaannokset/2016/en20161227.pdf) and other relevant legislation.

A comprehensive list of restrictions can be found from the Finnish Government’s webpage on [restrictions during the coronavirus epidemic](https://valtioneuvosto.fi/en/information-on-coronavirus/current-restrictions). Some of the most significant measures taken during the state of emergency are:

* Closing the borders of Finland on the 19th of March (however, Finnish citizens not prohibited to leave or enter the country although instructed not to do so)
  + Internal borders open to Norway, Denmark, Iceland, Estonia, Latvia and Lithuania on the 15th of June (reviewed every two weeks)
  + External borders are set to open on the 14th of July
* Closing the schools on the 18th of March and subsequently opening them on the 14th of May (remote teaching recommended until 31st July);
* Closing the Uusimaa region and restricting movement to, from and within it on the 27th of March and subsequently opening the region on the 15th of April;
* Closing restaurants on the 30th of March and subsequently opening them with some restrictions on the 1st of June;
* Restrictions on public gatherings; and
* Prohibiting visits to care institutions and hospitals.

The management of the coronavirus situation can be found from the Finnish Government’s webpage on [central government management of the coronavirus situation](https://valtioneuvosto.fi/en/information-on-coronavirus/central-government).

The Government announced on the 15th of June, that the state of emergency will be lifted in Finland on Tuesday the 16th of June 2020. Consequently, the use of powers under the Emergency Powers Act will end on that date. All Government decrees in force under the Emergency Powers Act will be repealed, and the management of the COVID-19 situation will continue under regular power of authorities and regular legislation.[[2]](#footnote-2) The decision of the Government follows from the steady decreasing of COVID-19 cases in Finland, with only 22 people in the hospital and three in intensive care[[3]](#footnote-3) at the time of writing (16June 2020).

# Summary of COVID-19 related topics in the work of the NHRI and independent ombudspersons

The independent Ombudspersons in Finland have received complaints and questions covering a wide range of issues during the state of emergency. The most common complaints have concerned children, schools and education. The Parliamentary Ombudsman has handled complaints in, for example, the grounds for admission to universities, arrangements for remote studying, school meals, learning support and arrangements for matriculation examinations. Other complaints regarding children have included the restrictions in meeting the child in divorced families, with grandparents and with prisoners. The Ombudsman for Children, the Non-Discrimination Ombudsman and the Ombudsman for Equality have all expressed concern on restricting the access of fathers, partners and other support persons to maternity hospitals.

Some of the Parliamentary Ombudsman’s own initiatives include subjects like care of elderly, restrictive measures and confinement in reformatory schools, effects of the coronavirus in prisoner health care. The Chancellor of Justice has also initiated investigations on differing legal binding norms and recommendations, transparency of information and maladministration in management of material preparedness.

# The Human Rights Centre

In the beginning of the COVID-19 crisis, the Human Rights Centre created a COVID-19 theme pages on their website to enable easy access to information about the effects of the pandemic on fundamental and human rights. The webpage includes information about the measures taken to combat the pandemic and links to other authoritative pages with information on the virus, its effects and the effects of the Government’s responses to the crisis. These pages exists in [Finnish](https://www.ihmisoikeuskeskus.fi/covid-19/) and [Swedish](https://www.manniskorattscentret.fi/covid-19/), with somewhat lesser information in [English](https://www.humanrightscentre.fi/covid-19/). In addition, the easy to read pages of the Centre include a link to external COVID-19 information in easy to read-language in [Finnish](https://selko.ihmisoikeuskeskus.fi/) and in [Swedish](https://lattlast.manniskorattscentret.fi/).

The Human Rights Centre is currently compiling a publication on the COVID-19 related changes in legislation, limitations to rights and freedoms and their impact on the implementation and enjoyment of human rights of all, and especially of persons with disabilities and older persons. The publication will include observations from the Human Rights Centre and the Ombudspersons as well as detailed discussion on the human rights impacts of specific measures taken by the Government in combatting COVID-19.

Additionally, the Human Rights Centre has worked actively within its national, European and international networks collecting information, discussing subject matters that concern NHRIs in the wider European network (ENNHRI) with regard the pandemic and related restrictions, limitations and legislative actions.

# The Parliamentary Ombudsman

## About the Parliamentary Ombudsman

The Parliamentary Ombudsman oversees the legality of actions taken by the authorities, primarily by investigating complaints received. Illegalities or shortcomings can also come to the Ombudsman's attention through other channels. In such cases, he can take matters under investigation on his own initiative. The Ombudsman also conducts on-site investigations in public offices and institutions. He has a special duty to make regular inspection visits to prisons and other institutions, such as psychiatric hospitals, in which persons can be confined against their will. Other places visited are units of the Defence Forces and Border Guard. In his work, the Ombudsman concentrates on promoting fundamental and human rights. Additionally, when he/she makes presentations, issues statements or writes articles, he/she emphasises the importance of these rights in the performance of public tasks and legislative drafting.[[4]](#footnote-4) The Parliamentary Ombudsman is a part of the Finnish National Human Rights Institution alongside the Human Rights Centre and the Human Rights Delegation.

## Complaints and investigative measures

The state of emergency has given rise to numerous complaints and investigative measures in the oversight of educational activities.

Universities and other institutions for higher education

By the 12th of May 2020, the Parliamentary Ombudsman received 23 complaints concerning universities and other institutes of higher education during the state of emergency. So far, information has been requested in cases related to the alteration of the grounds for admission to universities, the arrangement of mandatory teaching training, communications about the arrangement of teaching, and leisure travel requiring the Rector’s consent.

Complaints concerning the alteration of the grounds for admission to universities during the state of emergency caused by the coronavirus pandemic have related to the selection of new students in the fields of medicine, business administration and psychology. The complaints have included the following themes:

* Alterations of the selection criteria mid-way through the application process by increasing the proportion of students selected based on their matriculation examination grades by a substantial amount in some fields;
* Appropriateness of the communication of changes;
* The necessity/appropriateness of cancelling examinations in person; and
* Potential problems associated with arranging electronic preselection examinations, such as the availability of tools, technical conditions and the potential for cheating.

 The Parliamentary Ombudsman has requested from the Ministry of Education and Culture, an assessment of how the adopted changes to the selection criteria were arrived at and how the changes appear from the perspectives of equality among applicants, good governance, fair treatment, the protection of privacy, the requirement of proportionality, the duty to issue advice, and the appropriateness of communications. The Parliamentary Ombudsman also requested an evaluation of the perspectives relating to the electronic preselection process.

Early childhood education, basic education and general upper secondary education

By the 12th of May 2020, the Parliamentary Ombudsman received 31 complaints concerning early childhood education, basic education and general upper secondary education during the state of emergency. Information has also been requested on topics including the arrangement of school meals, preschool education, and learning support, as well as the advancing of sections of the matriculation examination. On his own initiative, the Parliamentary Ombudsman has asked the Ministry of Education and Culture to provide information on the guidelines for procedures, any practical problems that have arisen and the need for regulatory development with regard to support for pupils engaged in distance learning in basic education and the provision of school meals.[[5]](#footnote-5)

Freedom of movement

The Parliamentary Ombudsman has taken initiative to investigate cases concerning the actions of the police in overseeing the restrictions on freedom of movement and gatherings, as restricted under the Emergency Powers Act. The Parliamentary Ombudsman has stated that the police has issued several unjustified fines for people who have attempted to cross the Uusimaa province border during the lockdown of the Uusimaa region. Although attempting to cross the regional border without a cogent reason was prohibited, the breach of the restriction was not punishable under the Emergency Powers Acts. The issued fines are not final, and will be reviewed by the prosecutor. The Parliamentary Ombudsman considered it justified for prosecutors to thoroughly review all such cases to ensure that a lawful outcome has been (or will be) reached. The Parliamentary Ombudsman has asked the Prosecutor General to state the measures she has taken in this regard.[[6]](#footnote-6)

Care of the elderly

The Parliamentary Ombudsman took initiative to investigate the guidelines and supervision of elderly care especially during the state of emergency. The Parliamentary Ombudsman found that there continue to be severe shortcomings in the operating practices for elderly care and treatment in municipalities. The proper operations of municipalities are particularly important during states of emergency when the relatives and family members are not able to observe the care and treatment received by elderly people in case. The Parliamentary Deputy-Ombudsman has received several citizen complaints about the treatment of elderly people during the coronavirus and its subsequent restrictions. The complaints have included topics such as prohibiting meetings with the elderly, restricting the movement of the elderly as well as the lack of information of the wellbeing of the elderly in nursing homes and the lack of will and know-how to connect the elderly with their families via electronic devices.[[7]](#footnote-7) The Parliamentary Deputy-Ombudsman has requested a statement regarding these issues from the Ministry of Social Affairs and Health and the Finnish Institute for Health and Welfare.[[8]](#footnote-8) In addition, the Parliamentary Ombudsman has many ongoing activities concerning the care for elderly in the state of emergency.[[9]](#footnote-9)

Statistics

Between the 25 May and 10 June 2020 the Parliamentary Ombudsman received 503 complaints concerning the Covid-19 virus. The Ombudsman has issued a decision in 175 complaints; 328 are still pending.

Furthermore, the Ombudsman has initiated 20 own investigations. The subjects for the investigations include various matters such as the care of the elderly, restrictive measures and confinement in reformatory schools, dependent care, the effects of the corona virus in prisoner health care, the detention of foreigners during the corona outbreak, etc.

The Ombudsman has also submitted eight statements[[10]](#footnote-10) concerning the pandemic.

# The Chancellor of Justice

## About the Chancellor of Justice

The primary duty of the Chancellor of Justice is to oversee the legality of the actions of the public authorities. The Chancellor of Justice also oversees the realisation of fundamental and human rights. This duty entails the handling of complaints as well as observations made through inspections and otherwise. The duty to oversee the realisation of fundamental and human rights is also embedded in the Chancellor of Justice’s activities pertaining to the supervision of the Government’s decision-making processes.[[11]](#footnote-11)

## Supervision, complaints and investigative measures

The Chancellor of Justice has a pivotal role in the supervision of the correct application of constitutional law on state of emergency where principles of normalcy (priority for the ordinary legislation and ordinary powers of authorities), strict necessity of emergency measures and their proportionality are the leading principles. The Chancellor has been reviewing the constitutionality of the state of emergency and the emergency legislation proposed during it. The legislation and restrictions include among others the decision to close the Finnish borders.[[12]](#footnote-12) The opinion of the Chancellor of Justice was decisive in the decision to remove restrictions on the freedom of movement in the region of Uusimaa.[[13]](#footnote-13)

A major strength of the Finnish handling of the COVID-19 has been that the Parliament has clearly functioned as the supreme state organ and the principle of normalcy has been widely applied. Furthermore, the number of contaminations and deaths have been very moderate in Finland due to successful timing of the restriction measures.

However, a range of difficulties can be identified from the rule of law perspective:

* The [Emergency Powers Act](https://www.finlex.fi/fi/laki/ajantasa/2011/20111552) (in Finnish) is not drafted for situations like this;
* The Government has had difficulties to reason with sufficient precision on the restrictive measures;
* The Parliament has worked under a very tight schedule for legislative decision-making and has not received information in the way required by the Constitution.

The Chancellor of Justice has received nearly 300 citizen complaints. In addition, the Chancellor has initiated 12 investigations on its own on the COVID-19 crises. The own initiative investigations concern, among others,

* the differentiation between recommendations and binding legal norms, which has been somewhat unclear in the Governmental communications,
* the transparency of the information and scientific modelling underlying the strategic decisions on the Finland’s COVID-19 strategy
* the difficulties and maladministration present in the management of material preparedness (protective masks in particular).

The Chancellor has used the right of intervention and legislative initiative to secure fluid and speedy handling of unemployment insurance applications when the number of such applications have peaked.

# Non-discrimination Ombudsman

## About the Non-discrimination Ombudsman

The task of the Non-Discrimination Ombudsman is to promote equality and to prevent discrimination. The Non-Discrimination Ombudsman is an autonomous and independent authority. The Non-Discrimination Ombudsman handles cases of discrimination on the basis of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics. The Ombudsman also works towards improving the rights, living conditions and status of groups at risk of discrimination, such as foreign nationals. The Ombudsman further supervises the removal from the country of foreign nationals and is the [National Rapporteur on Trafficking in Human Beings](http://www.syrjinta.fi/web/fi/ihmiskauppa).[[14]](#footnote-14)

## Complaints and information provided

The Non-Discrimination Ombudsman has received many complaints and requests for information about the consequences of COVID-19 on non-discrimination and equality. The Ombudsman has produced among other answers a blog post[[15]](#footnote-15) about detention and release procedures during the state of emergency. In addition, the Ombudsman has gathered links to several sites that provide COVID 19 -information in different languages[[16]](#footnote-16) and has promoted the blog post and news items in social media channels as well as taking part in discussions on Twitter about the right to get sign language interpretation remotely for children’s hobbies.

Most of the complaints concern cases of discrimination or violations of other rights due to issues related to the COVID-19 crisis. In addition, the Ombudsman has handled general requests for guidance related to persons’ rights during COVID-19 crisis and reports of problems individual people in a vulnerable situation face during the crisis. Most commonly, the complaints received have concerned social and health services, but there are also complaints regarding areas such as education, housing, reception services for asylum seekers, protective custody and removal of foreigners. The most common ground of discrimination in the complaints in question is disability or state of health. Other grounds include age, family relationships, national or ethnic origin and other status, like place of residence, residence status of foreigners and sosio-economic status.

The Ombudsman has received contacts regarding a rumored (unable to verify) intent of some authorities in the social and health care sector to proactively  limit access of disabled persons to intensive care in case of a Covid-19 infection without a personal assessment in an individual circumstances  of a disabled person. Such discrimination was later explicitly prohibited by the Ministry of Social Affairs and Health.

# The Ombudsman for Equality

## About the Ombudsman for Equality

The Ombudsman for Equality is an independent authority whose main duty is to supervise compliance with the Act on Equality between Women and Men. The Ombudsman has powers on matters related to gender and gender minorities. The powers of the Ombudsman consist of both combating discrimination and promoting equality. The Ombudsman carries out her tasks primarily by providing guidance and advice.[[17]](#footnote-17)

## Observations

The Ombudsman for Equality has commented on the issue of denying fathers and other support persons the access to maternity hospitals during labour and other pregnancy related check-ups. The Ombudsman stated that it is extremely important that mothers and their partners have equal chances to participate in the life of the child during pregnancy and labour in the prenatal clinics and medical centres. However, the Ombudsman has acknowledged its lack of competence and authority to intervene with the measures taken to protect the prenatal clinics and maternity hospitals from the spreading of the COVID-19 virus.[[18]](#footnote-18)

# The Ombudsman for Children

## About the Ombudsman for Children

The Ombudsman for Children’s role is to ensure that the status and the rights of the child are upheld by legislators and society’s decision-makers. The Ombudsman evaluates how well children’s rights are protected in Finland and promotes improvements. In addition, the Ombudsman represents children’s interests in public debates and decision-making processes and works together with other agents to build a good and just society for children.

The Ombudsman for Children in Finland does not have authority over the affairs of individual children or families, but approximately 650 individuals contact the Ombudsman annually. The Ombudsman cannot comment or overturn other authorities’ decisions. However, the Ombudsman can encourage public debate about specific phenomena and alert decision-makers to issues that are important from the perspective of the rights of the child that might otherwise not get the attention they deserve.  In Finland, ultimate responsibility for protecting the rights of the child falls on the Parliamentary Ombudsman. The Parliamentary Ombudsman oversees the legality of actions taken by the authorities, primarily by investigating complaints.[[19]](#footnote-19)

## Contacts by individuals and other measures

First contact related to the pandemic was registered on the 12th of March, and by the 8th of June, of the 123 contacts that the Ombudsman’s office received during that period, 59 – in other words 58 percent of the contacts – dealt with the pandemic.

Contacts (59) concerned the following themes:

* School / day care (18)
  + mainly the question of whether children should or should not go to school, and problems with studying remotely.
* Child welfare institutions (7)
  + mainly the question of children placed in foster families or residential care being restricted of meeting with their families.
* School meals (7)
  + Lack of school meals or their poor quality was an issue in many municipalities, even though the Chancellor of Justice reminded the municipalities of their responsibility to provide free school meals.
* Restrictions in meeting the child (divorce families & grandparents) (6)
  + Restrictions in meetings touched divorce families and grandparents.
* Maternity hospitals restrictions (6)
  + Maternity hospitals restricted the presence of fathers, other parents, and support people, which caused a lot of anxiety among the pregnant women.
* Prisoners meetings with their children (3)
  + The prisons restricted the meetings of prisoners with their children beginning from March. This restriction is ongoing on the 12th of June.
* Income (2)
* Other (10)

The Ombudsman for Children has been particularly worried about the children that have been in vulnerable situation already prior to the pandemic. These include, for example, children with child welfare background, children in families with domestic violence, substance abuse, mental illnesses or financial problems, children with disabilities or learning difficulties, children in minorities such as Roma-children and Sami-children, and children with immigrant background. The Ombudsman also has concerns about the lack of social contacts and support in many families. The Ombudsman has advised citizens in reaching the right agencies in their particular cases.

Many of the contacts to the Office of the Ombudsman for Children came from professionals in different fields (schools, day care centres, child welfare), but as the Ministries and State Agencies begun to send out directions and instructions, the contacts decreased rapidly. The Ombudsman has had regular contact with different ministries, state agencies, NGO’s, researchers, and the Lutheran Church and it has reported weekly to the Government of the observations in the field. In addition, the Ombudsman has send reminders to the different ministries and standing committees as well as contacted the Criminal Sanctions Agency in order to discuss the rights of the children of the prisoners to meet their parents. Furthermore, the Ombudsman has taken a visible role in the media reminding of the rights of the child.

The Ombudsman held a meeting with the Nordic Ombudsmen for Children from Iceland, Sweden, Norway, Åland Islands and Greenland. The experiences and worries in different countries were very similar, even though the policies varied significantly.

The Ombudsman performed a survey to the 32 members in the Ombudsman’s Child Advisory Board that represent different ministries, agencies, NGO’s, and researchers. The results of the survey were discussed within the Board, and given to the working committee that prepares a strategy to support the rights of the child after the Covid-19-pandemic.

The Ombudsman for Children has been a member of an independent scientific panel set up by the Government to provide academic research based knowledge on the pandemic and its effects on the society.

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1. [Finnish Government, ’Decrees concerning the use of powers under the Emergency Powers Act to Parliament’ (17 March 2020)](https://valtioneuvosto.fi/en/article/-/asset_publisher/10616/valmiuslain-kayttoonottoasetus-eduskunnalle) [↑](#footnote-ref-1)
2. [Finnish Government, ’Use of powers under the Emergency Powers Act to end – state of emergency to be lifted on Tuesday 16 June’ (15 June 2020)](https://valtioneuvosto.fi/en/article/-/asset_publisher/10616/valmiuslain-mukaisten-toimivaltuuksien-kaytosta-luovutaan-poikkeusolot-paattyvat-tiistaina-16-kesakuuta) [↑](#footnote-ref-2)
3. Regularly updating information on COVID-19 cases in Finland can be found from the [Finnish Institute for Health and Welfare’s ’Situation update on coronavirus’ -webpage](https://thl.fi/en/web/infectious-diseases/what-s-new/coronavirus-covid-19-latest-updates/situation-update-on-coronavirus) [↑](#footnote-ref-3)
4. [Parliamentary Ombudsman of Finland, ’The work of the Ombudsman’](https://www.oikeusasiamies.fi/en_GB/web/guest/the-work-of-the-ombudsman) [↑](#footnote-ref-4)
5. [The Parliamentary Ombudsman, ’The state of emergency and education’ (15 May 2020)](https://www.oikeusasiamies.fi/en_GB/-/poikkeusolot-ja-koulutus) [↑](#footnote-ref-5)
6. [The Parliamentary Ombudsman, ’Legal problems related to the oversight of restrictions on mobility and gatherings’ (11 May 2020)](https://www.oikeusasiamies.fi/en_GB/-/liikkumis-ja-kokoontumisrajoitusten-valvonnassa-oikeudellisia-ongelmia) [↑](#footnote-ref-6)
7. [The Parliamentary Ombudsman, ’Restrictions affecting the elderly during the coronavirus’ (in Finnish) EOAK 3232/2020 (18 June 2020)](https://www.oikeusasiamies.fi/r/fi/ratkaisut/-/eoar/3232/2020) [↑](#footnote-ref-7)
8. Ibid, 34 [↑](#footnote-ref-8)
9. [The Parliamentary Ombudsman, ’Deputy-Ombudsman concerned by the lack of guidelines for and supervision of elderly care’ (28 April 2020)](https://www.oikeusasiamies.fi/en_GB/-/apulaisoikeusasiamies-huolissaan-vanhustenhuollon-ohjeistusten-ja-valvonnan-puutteista) [↑](#footnote-ref-9)
10. [The Parliamentary Ombudsman Press Releases](https://www.oikeusasiamies.fi/en_GB/web/guest/press-releases) [↑](#footnote-ref-10)
11. [The Chancellor of Justice, ’Duties and activities’](https://www.okv.fi/en/chancellor/duties-and-activities/) [↑](#footnote-ref-11)
12. [The Chancellor of Justice, OKV/61/10/2020 (in Finnish)](https://www.okv.fi/en/tiedotteet-ja-puheenvuorot/538/oikeuskansleri-tuomas-poystin-selvityspyynnot-covid-19-epidemian-yhteydessa/) [↑](#footnote-ref-12)
13. [The Chancellor of Justice on the removal of restrictions on freedom of movement in Uusimaa region (in Finnish)](http://www.okv.fi/media/filer_public/cd/46/cd468f18-10b9-4d94-8238-4ecce0ebc218/oikeuskanslerin_lausunto_valtioneuvostolle_1542020.pdf) [↑](#footnote-ref-13)
14. [The Non-Discrimination Ombudsman, ’Duties of the Ombudsman’](https://www.syrjinta.fi/web/en/the-task-of-the-ombudsman) [↑](#footnote-ref-14)
15. [Non-discrimination Ombudsman, ’No person may be held in detention without legislative prerequisites, even in emergency conditions’ (2 April 2020)](https://www.syrjinta.fi/web/en/-/no-person-may-be-held-in-detention-without-legislative-prerequisites-even-in-emergency-conditions) [↑](#footnote-ref-15)
16. [Non-discrimination Ombudsman, Information about the corona virus in different languages](https://www.syrjinta.fi/-/tietoa-koronaviruksesta-eri-kielilla) [↑](#footnote-ref-16)
17. [The Ombudsman for Equality](https://www.tasa-arvo.fi/web/en/ombudsman-for-equality) [↑](#footnote-ref-17)
18. [Yhdenvertaisuusvaltuutettu, ’Isien ja tukihenkilöiden läsnäolon rajoittaminen synnytyssairaaloissa koronan vuoksi’ (29.4.2020)](https://www.tasa-arvo.fi/-/isien-ja-tukihenkiloiden-lasnaolon-rajoittaminen-synnytyssairaaloissa-koronan-vuoksi) [↑](#footnote-ref-18)
19. [The Ombudsman for Children, ’Promoting the rights of children’](http://www.lapsiasia.fi/en/ombudsman/) [↑](#footnote-ref-19)