

# WORKING DOCUMENT

Optimizing Finnish Immigration Process for highly qualified experts

V. 0.9 21.5.2018  
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## Introduction

This is a working document that maps the current status of immigration process of specialist relocating to Finland.

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## Policy recommendations

### 2018-2019: Taking the easy steps

#### High level policy decisions

- **From inter-governmental silos to co-operation:** All ministries and governmental agencies should co-operate in building a smooth decision making chain from step 2 to the end of step 3 in this document. This might require a cross governmental working group.
- **Buck-passing has to end:** All actors in the decision-making chain should trust on the identification done by the embassy and that should be the only step where a face to face meeting with public authorities is needed. An employee immigrating to Finland has to have clear, coherent and correct information on all steps in the decision-making chain from one website.

#### eGovernment:

- **Video appointments:** When physical presence is not needed, it should be possible to have video appointments with public authorities
- **Receipts:** Companies need receipts to fulfil Finnish accounting requirements. Public authorities have to provide receipts for all the payments on their services.
- **Strict once-only principle for the process:** *Ulkomaalaisrekisterilaki* has to be built futureproof so that it allows full data transfers between all parties in the decision-making chain. All data should be requested as early as possible and only once during the process.

### 2019-: 100 million euros for getting the best talent in the world to move to Finland

#### High level policy decisions:

- **Cross governmental policy goals:** Clear target dates should be set for the whole process (e.g. Step 2 in this document), instead of on only some parts of it at a time. The whole process from step 2 to the end of step 3 in this document should not take longer than 1 month. This means that each step of the process needs to be streamlined and made more accessible in English.
- **English:** English should be one of the official languages used in the immigration making process.
- **No welcome-to-Finland-tax:** Immigration costs paid by the employer should not be considered taxable personal income. Immigration-related expenses paid by the employee should be deductible from personal income tax (also Finnish ID card).

#### Sufficient resources for:

- **Marketing and branding:** Talent Finland has to have sufficient resources for successful nation branding in co-operation with cities. The capital region has to be marketed under single unified brand.
- **Good service design:** Migri's InLand team should be responsible for the service design of the whole immigration process from an embassy to Vero.
- **Smooth and reliable service chain:** All actors in the decision-making chain should have sufficient resources for providing clear information on the immigration process in English and for quick and reliable decision-making also during both holiday seasons and rush times (when new students arrive to Finland).
- **One stop shops:** All services for employees immigrating to Finland should be available from Talent Finland "one stop shops".
- **Synergies through co-operation:** In co-operation with other EU/Nordic countries, embassy network accepting residence permit applications have to be widened.
- **Integration:** Sufficient support for the integration of spouses to Finnish job markets has to be secured, as otherwise the recruited specialists move away from Finland.
- **Access to education:** All children moving to Finland with highly skilled specialist should have automatic and immediate access to pre-school, basic and secondary education in other languages than Finnish or Swedish.

#### Satisfactory is not good enough

- **Immigration bureaucracy is more than just paper work, it is also about engaging highly qualified experts to Finland:** All highly qualified experts should receive an official Welcome Box while picking up their residence permit card.

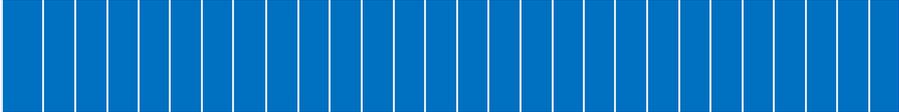
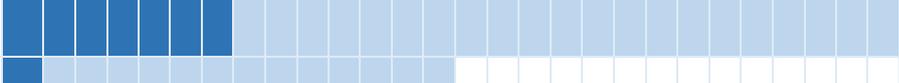
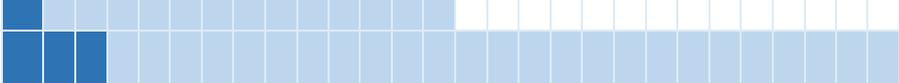
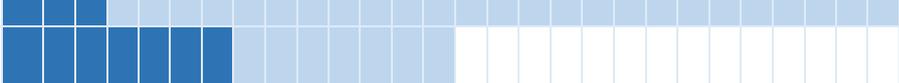
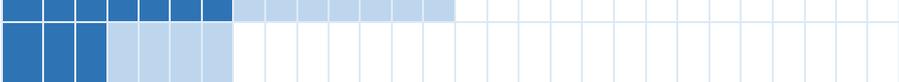
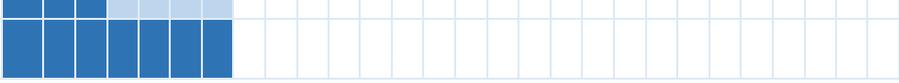
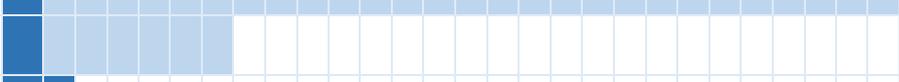
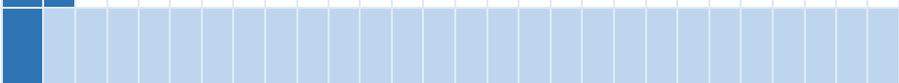
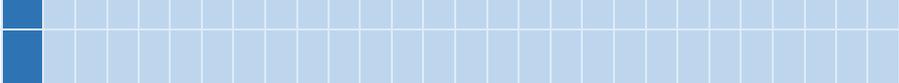
#### eGovernment

- **Single tracking tool for the whole process:** Tracking tools allowing immigrating employees to follow the status of their whole immigration process through steps 2 and 3 in this document. This would enable government to follow actual decision-making times instead of just small parts of them.
- **Universal Digital Embassy:** Finnish embassies abroad should build their immigration services around a digital platform, so that no excessive traveling during the immigration process should be required from the applicant before actually moving to Finland. Flying from state of residence to an embassy costs huge amount of emissions, and in many cases slows the process down significantly.
- **A single service to unite them all:** All the information from for the whole immigration process and clear checklist for each step in it from an embassy to tax registration should be centralized on a single website. Both the employer and applicant should have access to modify the applications and track their status in the administrative process. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying the residence permit

when needed. The notifications from the progress and status of the immigration process should be sent to both the employer and employee.

- **One application:** A single application process for the whole family.
- **Preliminary decisions:** The system should allow making preliminary decisions that are automatically carried out when all required preceding decision-making steps have been carried out.
- **eSignature:** Electronic signatures should be accepted from trusted countries. Finnish government has to take a lead on building a global standard for eSignatures.
- **Enabling algorithmic decision making:** Humans should make decisions on unclear cases. All clear cases should be approved by decision making algorithms. This means that the competent authorities liability (*virka**vastuu*) should be widened from an individual decision to automated decision making system.

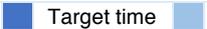
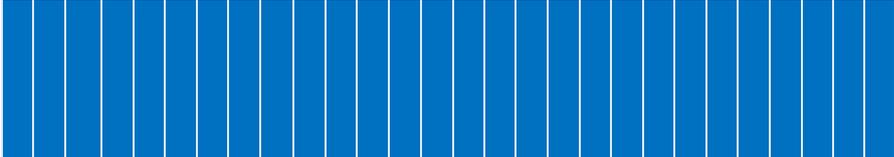
Summary: From a foreign super talent to a leading Finnish expert in one month

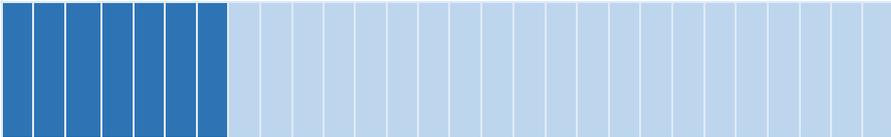
Current times and target times of different steps in immigration process (days)	
<b>STEP 1: Making Finland an attractive place to work</b>	
1. Finding a highly qualified person, who is ready to move to Finland.	
<b>STEP 2: Overcoming the bureaucratic obstacles in the residence permit process</b>	
1. An employee agrees to move to Finland	
2. Registration at Enter Finland portal	
3. Meeting at the embassy	
4. A confirmation from the embassy	
5. A decision from Migri	 Sometimes more than a month
6. A printing company prints and sends the card	
7. Embassy checks the card and sends it to the employee	
8. An employee flies to Finland	
<b>STEP 3: Overcoming the bureaucratic obstacles in the registration process in Finland</b>	
1. Registration for a place of residence (kotikunta) at magistrate	 Sometimes more than a month
2. National identity card from police	
3. Getting access to a strong identification system from a bank	
4. Registering to KELA for health insurance and health care	
5. Registering to VERO for a tax card	
<b>STEP 4: Integrating in Finland</b>	
1. Finding a job for spouse	 Can take years
2. Finding a school for kids	 Can take a year
	

What does this mean in practice? An example of immigration process:

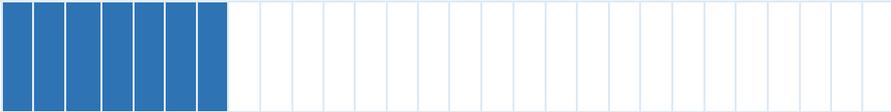
<b>Date:</b>	<b>Action taken</b>
7.11.2017	A game developer studio started to look for a new highly skilled specialist
26.1.2018	After about two months, the game developer studio found a new employee from India that was ready to move to Finland
30.1.2018	It took two days for the employee to register at Enter Finland Portal
<b>27.3.2018</b>	<b>The person was forced to wait two months before there was free times lot for a meeting at the Embassy in New Delhi.</b>
29.3.2018	An approval from the Embassy.
22.4.2018	A residence permit arrives to Embassy and the person can fly to Finland.

## Optimizing Finnish Immigration Process for Highly Qualified Specialist

Targeted times of different steps in immigration process (days)		
		
<b>STEP 1: Making Finland an attractive place to work</b>		
<b>1. RECRUITEMENT</b> Finding a highly qualified person, who is ready to move to Finland		Can take from months to years
	<p><b>What:</b> Marketing Finland as an attractive place to work</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Global Presence (UM, TEM, Cities/Regions):</b> Continuous global presence of Finland in global media and key industry events</li> <li>- <b>Marketing material (UM, Cities/Regions):</b> Easily available, constantly updated and high-quality marketing material on Finland and its game dev hubs as a place to live and work. Especially testimonials are needed.</li> <li>- <b>A toolbox (UM, TEM):</b> Toolbox helping Finnish companies to tackle immigration process.</li> <li>- <b>Exception management (TEM):</b> Business Finland should support companies in building up exception management strategies</li> <li>- <b>Single brand for capital region (Cities):</b> Improving global attractiveness of the capital region under a single unified brand</li> </ul>	
<b>STEP 2: Overcoming the bureaucratic obstacles in the residence permit process (max 30 days)</b>		
<b>1. A CONTRACT</b> A new employee agrees to move to Finland		Now: 2-5 days Target: 0 days
	<p><b>The reason for delay:</b> Posting physical copies of signed documents from employee to an embassy and to an employer.</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>eSignature (UM, VM):</b> The embassy should always accept electronic signatures from trusted countries. On the long run, a global system for electronic signatures is needed.</li> <li>- <b>Call-back service (UM):</b> If problems should occur, the embassy should call to employer for clarification</li> </ul>	

<p><b>2. A</b> <b>REGISTRATION</b> at Enter Finland Portal</p>		<p>Now: few days Target: 0 days</p>
	<p><b>The reason for delay:</b> The employee is struggling with misleading information on Enter Finland Portal while submitting the electronic application</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>Check-lists (SM/Migri, UM):</b> Migri and UM should provide clear checklists and easy to understand animated videos on how to apply a residence permit in different cases.</li> <li>- <b>Low-threshold support (Migri):</b> Migri should run a social media group (e.g. on Facebook or LinkedIn) where they could inform HR specialists on changes in the immigration process and reply to questions.</li> <li>- <b>Correct information (SM/Migri, UM):</b> Removing misleading information from the website (e.g. can one first come to Finland with an existing Schengen Visa and apply a residence permit from Finland, is a degree from higher education required) and making the access to right forms easier (e.g. the form to use with spouses who are not in Finland) e.g. by introducing a well-working search function in English. The website introducing the requirements for highly qualified experts should have some examples from games industry (e.g. game artists and coders). Migri has to give clear guidelines for the formal requirements, so that there are no surprises to the applicant.</li> <li>- <b>Functional payment services (SM/Migri):</b> Companies should be able to pay both the residence permits of their employees and their families on the EnterFinland site. There has to be an easy way to get a receipt from all payments done by companies.</li> <li>- <b>Tracking system (SM/Migri):</b> A tracking system needs to be build, so that the employee can track the status of his or her application through the whole process from the embassy to Migri and back.</li> <li>- <b>Single service to unite them all (SM/Migri, UM/embassies, TEM, VM/Vero/Maistraatti):</b> All the information from the whole immigration process from an embassy to tax registration should be centralized on a single website. Both the employer and applicant should have an access to modify the application. The information submitted on through the site should be stored on user accounts so that all information would be ready for reapplying the residence permit when needed. The notifications from the progress and status of the immigration process should be sent to both the employer and employee.</li> <li>- <b>One application (SM/Migri):</b> If the specialist moving to Finland has family members, they can apply for a residence permit at the same time. The goal of the Finnish Immigration Service is to make a decision on whole family's applications simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the whole family should be able to apply residence permits under a single application.</li> </ul>	
<p><b>3. AN</b> <b>APPOINTMENT</b> at an embassy</p>		<p>Now: From few days to weeks Target: an appointment in 1 week,</p>
	<p><b>The reason for delay:</b> Delays in getting a timeslot from the embassy for identification and submitting the application (fingerprints) and possibly flying to get to the embassy.</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>Universal Digital Finnish Embassy (UM):</b> <ul style="list-style-type: none"> <li>o Universal Digital Embassy should be established, so that the applicants wouldn't have to travel to a physical embassy. Excessive flying causes harmful emissions and, in many cases, slows the process down significantly.</li> <li>o Video appointments should be made available when possible.</li> </ul> </li> </ul>	

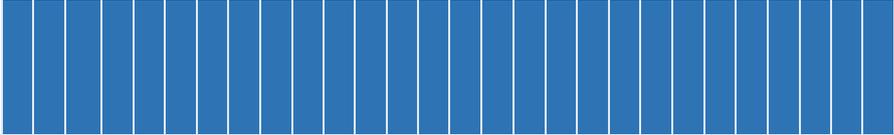
<p><b>4. A CONFIRMATION</b> from the embassy</p>		<p><b>Now: From few days to weeks</b> <b>Target: an approval in 1 day</b></p>
<p><b>The reason for delay:</b> Delays in getting a confirmation from the embassy to Migri for starting the application review process</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Sufficient Human Resources (UM):</b> The embassy has to have enough human resources confirm the application within 1 day from the appointment</li> <li>- <b>Accessibility (UM):</b> The electronic systems for handling the residence permit applications should be accessible in a local language or at least in English so that embassies could hire and train local staff for processing the applications</li> <li>- <b>Good public procurement (UM):</b> Possible use of outsourced services like VFS for processing the applications should not create an extra lag to the process</li> <li>- <b>Synergies through cooperation (UM):</b> On the long run, co-operation with other EU/Nordic Embassies on securing that application can be given in an embassy closest to the applicant. A European standard for identifying a person is needed for this.</li> </ul>		
<p><b>5. A DECISION</b> from Migri</p>		<p><b>Now: from few days to months</b> <b>Target: 3 days</b></p>
<p><b>The reason for delay:</b> Migri is under-resourced to process the applications on time, especially under peak months and holiday seasons</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>Sufficient resources (SM/Migri):</b> Migri has to have sufficient human resources to process the applications in 3 days, even during the busy seasons</li> </ul>		
<p><b>6. THE RESIDENCE PERMIT CARD</b> Printing and sending the residence permit card</p>		<p><b>Now: About 2 weeks</b> <b>Target: 1 week</b></p>
<p><b>The reason for delay:</b> A company subcontracted for printing the residence permit card prints it and sends it to the embassy. Printing and sending the printed card takes too much time.</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>Sufficient resources (SM/Migri):</b> More resources for the printing company for printing and sending the cards</li> </ul>		

<p><b>7. A CHECK</b> The embassy checks the card and sends it to the employee</p>		<p><b>Now: About a week</b> <b>Target: 3 days</b></p>
	<p><b>The reason for delay:</b> Delays in checking the card and sending the card to applicant or asking the applicant to collect the card from embassy</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Functional payment services (UM):</b> The applicant should be allowed to pay the posting costs already when the residence permit application is submitted. On the long run, there should be a way for the company to pay these costs directly.</li> <li>- <b>Sufficient resources (UM):</b> The embassy has to have enough human resources to process the application in one day</li> <li>- <b>Functional delivery:</b> <ul style="list-style-type: none"> <li>o <b>(UM)</b> In all countries, where it is possible, the embassy should provide an opportunity to send the residence permit card automatically to the employee from the embassy by using a trusted courier. The embassy has to clearly inform all applicants about this possibility.</li> <li>o <b>(UM)</b> The embassy has to have an access to a system that automatically sends a notification to the employee applying the residence permit, when the card arrives to the embassy and when they can come to collect it, or it has been sent forward from the embassy to the employee.</li> <li>o <b>(UM, SM/Migri)</b> In the short run, handling and processing the residence permit applications should be outsourced to companies like VFS as far as possible. In the long run, <i>Ulkomaalaislaki</i> has to be amended in a way that residence permit cards can be sent directly to the employee from the manufacturer in countries where post system allows this.</li> <li>o <b>(UM/SM)</b> There should be an option for applicants to ask their residence permit cards to be sent to and checked at Helsinki-Vantaa Airport upon their arrival to Finland.</li> </ul> </li> <li>- <b>Welcome box (UM, SM/Migri):</b> In addition to official immigration documents everyone moving to Finland should receive an official Welcome Box informing the applicant about the next steps of immigration process including a reminder of their responsibility to notify Migri of all status changes immediately.</li> </ul>	
<p><b>8. A RELOCATION</b> The employee moves to Finland</p>		<p><b>Now: About a week</b></p>
	<p><b>The reason for delay:</b> Booking the tickets and flying to Finland</p>	

### STEP 3: Overcoming the bureaucratic obstacles in the registration process in Finland

<p><b>1. A PLACE OF RESIDENCE</b> Registration for a place of residence (kotikunta) at magistrate</p>		<p><b>Now: from one to two days</b> <b>Target: 0 days</b></p>
<p><b>The reason for delay:</b> The employee must go physically to local register office (magistrate) in order to register her or himself for an official place of residence (kotikunta). Finnish post service works slower and slower, which causes delays on sending and receiving the applications.</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>— <del><b>Accessible services (VM):</b> The local register office (magistrate) should accept English as transaction language (SOLVED)</del></li> <li>- <b>Ask only once (VM, UM):</b> Moving all data automatically from the residence permit data base to the Population information system, including information on children and spouse. For this reason Ulkomaalaisrekisterilaki has to be amended in a way that automatic data transfers are possible and each actor in the process has to be trained for collecting the information so reliably that it does not need to be double checked later in the process.</li> <li>- <b>Smart automated decision-making (VM):</b> The registration should be done electronically and automatically on the moment the residence permit is granted. In the short run, magistrate has to have sufficient number of staff for processing the applications quickly under all circumstances. On the long run, purely administrative decisions should be made by algorithms controlled by competent public official with clear liability on the decisions.</li> <li>- <b>Accessible services (VM):</b> A fully electronic service is needed also for those who do not have access to strong electronic identification system (e.g. the decision would be accessible online with a password given to the employee when he or she registers in magistrate)</li> </ul>		
<p><b>2. A NATIONAL IDENTITY CARD</b> from police</p>		<p><b>Now: a week</b> <b>Target: 0 days</b></p>
<p><b>The reason for delay:</b> In order to get a national identity card, the employee must be reidentified by police</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Functional delivery:</b> <ul style="list-style-type: none"> <li>o <b>(SM/Migri)</b> The information for the national identity card should be automatically transferred from the residence permit application</li> <li>o <b>(SM/Migri)</b> The person should be allowed to preorder the national identity card already when she or he submits the residence permit application</li> </ul> </li> <li>- <b>Ask only once (UM, SM/Migri):</b> For persons coming from trusted countries, the identification done at the embassy should be enough.</li> <li>-</li> </ul>		
<p><b>3. AN ACCESS TO STRONG IDENTIFICATION SYSTEM</b> from a bank</p>		<p><b>Now: 1-2 days</b> <b>Target: 1-2 days</b></p>
<p><b>The reason for delay:</b> A person needs a national identity card in order to get online banking accounts from a bank, which are needed in to get access to strong identification system allowing him or her to access public services online.</p> <p><b>Solutions:</b></p>		

	<ul style="list-style-type: none"> <li>- National identity card should not be required for granting an access to strong online identification system, a passport and residence permit should be enough</li> </ul>	
<b>4. HEALTH INSURANCE AND PUBLIC HEALTH CARE from KELA</b>		<b>Now: About 1 month</b> <b>Target: 0 days</b>
	<p><b>The reason for delay:</b> Delays in registration to KELA for health insurance and public health care</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Streamlined application process (SM/Migri):</b> The employee should be allowed to apply for the health insurance, while filling the residence permit application.</li> <li>- <b>Accessible services (STM):</b> Key information about the health insurance decision should be available in English</li> <li>- <b>Ask only once (SM/Migri):</b> Ulkomaalaisrekisterilaki's 10§ should be implemented in a way that allows full data transfer to Kela. Data transfers from Ulkomaalaisrekisteri to KELA should be technically possible.</li> <li>- <b>Sufficient resources ( STM/KELA):</b> KELA has to have sufficient resources for processing the applications. KELA card should not take 6 months to arrive.</li> </ul>	
<b>5. A TAX CARD</b> Registering to tax authority for a tax card		<b>Now: 0 days to weeks</b> <b>Target: 0 days</b>
	<p><b>The reason for delay:</b> An employee must register to VERO for taxation. However, for foreign specialists/key employees only the capital region can offer tax administration services that are fast, as there the tax administration is familiar with international situations. Outside the capital region a more complex tax card application can take several weeks as the tax office needs to check legislation/practice before making a decision.</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Streamlined application process (SM/Migri):</b> One should be able to apply a tax card already while applying the residence permit</li> <li>- <b>Ask only once (VM):</b> The information for a tax card should be automatically transferred from the residence permit application</li> </ul>	
<b>STEP 4: Integrating in Finland</b>		
<b>1. A NEW HOME</b> Starting a new life in Finland		
	<p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Accessible services (National government, cities):</b> All key public services should be available in English</li> <li>- <b>Toolbox (Cities):</b> A tool-box for finding a flat, hobbies etc.</li> <li>- <b>No “welcome to Finland” tax (VM):</b> Immigration costs paid by the employer should not be considered as taxable personal income “welcome-to-Finland tax”</li> </ul>	

<p><b>2. A SPOUSE</b> Finding a job for a spouse</p>		<p>Now: 1 month to years Target: half a year</p>
<p><b>The reason for delay:</b> If the employee's spouse is unable to find a job, the couple / family is likely to leave Finland</p> <p><b>Solutions:</b></p> <ul style="list-style-type: none"> <li>- <b>Sufficient resources (TEM):</b> Well-resourced Talent Finland Hubs in all key game dev hubs in Finland</li> <li>- <b>Targeted services (TEM):</b> <ul style="list-style-type: none"> <li>o Academically educated foreign workforce in the Finnish job market, originally arriving to Finland as spouses of a person employed in Finland, should be a special focus area of public services</li> <li>o Public employment services should have at least one service point where specifically trained personnel for highly educated foreigners are available</li> </ul> </li> <li>- <b>Better services (TEM):</b> <ul style="list-style-type: none"> <li>o Integration plans should be more thought over, longer, and have more detail.</li> <li>o The rules of the Finnish labour market should be better explained to all clients.</li> </ul> </li> <li>- <b>Accessible services (TEM):</b> <ul style="list-style-type: none"> <li>o Waiting time from public employment service evaluation to actual integration plan steps, such as language course placement, should be cut from current several months to maximum 1 month.</li> <li>o Public employment services should offer online services in English.</li> </ul> </li> <li>- <b>Single point of contact (SM, TEM, Cities):</b> Cities and the national government should build up well-resourced International Houses, where all immigration services are easily accessible.</li> </ul>		
<p><b>3. CHILDREN</b> Finding a school for kids</p>		<p>Now: from 1 month to 1 year Target: 1 month</p>
<p><b>The reason for delay:</b> For example, in Helsinki there are not enough places for children in public schools providing education in English. In the worst case, a child does not pass the entrance examination to a school (e.g. SYK in Helsinki) and she or he forced to use a year to study Finnish to be able to enroll to a Finnish school. This is particularly challenging for children in the older end of compulsory education, as it means they need to take a gap year from all subjects while they learn Finnish.</p> <p><b>Solution:</b></p> <ul style="list-style-type: none"> <li>- <b>Accessible education (Cities):</b> Cities must open schools providing pre-school, primary and secondary education in other languages than Finnish or Swedish.</li> </ul>		

## Annex 1: Abbreviations

EU	Euroopan unioni, the European Union
KELA	Social Insurance Institution in Finland (public entity)
Maistraatti	Magistrate
Migri	Finnish Immigration Services
SM	Sisäministeriö, Ministry of the Interior
TEM	Työ- ja elinkeinoministeriö, Ministry of Labour and Livelihood
UM	Ulkoministeriö, Ministry of Foreign Affairs
Vero	Verohallinto, Finnish Tax Authorities
VM	Valtiovarainministeriö, Ministry of Finances