

WORKING DOCUMENT

Optimizing Finnish Immigration Process for highly qualified experts

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Introduction

This Neogames working document maps the immigration process of specialists trying to relocate to Finland and the challenges they face while doing so.

The share of non-Finnish employees in the Finnish games industry has been rising steadily over recent years¹. The total percentage of non-Finnish employees working in Finnish studios in 2020 in Finland was 28 %, remaining almost on the same level as in 2018 (27 %) despite the ongoing pandemic. Altogether, 13 % of the Finnish games industry employees came from outside the EU/ETA area (10 % in 2018). There is no specific country or region where the Finnish games industry hires its new talents. Instead, they are coming all over the world.

The majority of non-Finnish employees work in mature companies (65 %) and established companies (20 %) and companies with more than 50 employees (78 %). However, there is a significant amount of non-Finnish employees in small companies and early-stage start-ups and start-ups.

During 2020, the COVID19 pandemic temporarily slowed down the recruitment process due to global travel restrictions and administrative delays caused by lockdowns of onsite public services. Beyond demonstrating the urgent need to move the immigration process in a completely online environment (e.g. only online meetings with Migri), the COVID19 outbreak introduced completely new challenges. In particular, the administrative difficulties related to pasted workers (both from Finland to third countries and third countries to Finland) need urgent attention in the post-COVID 19 world.

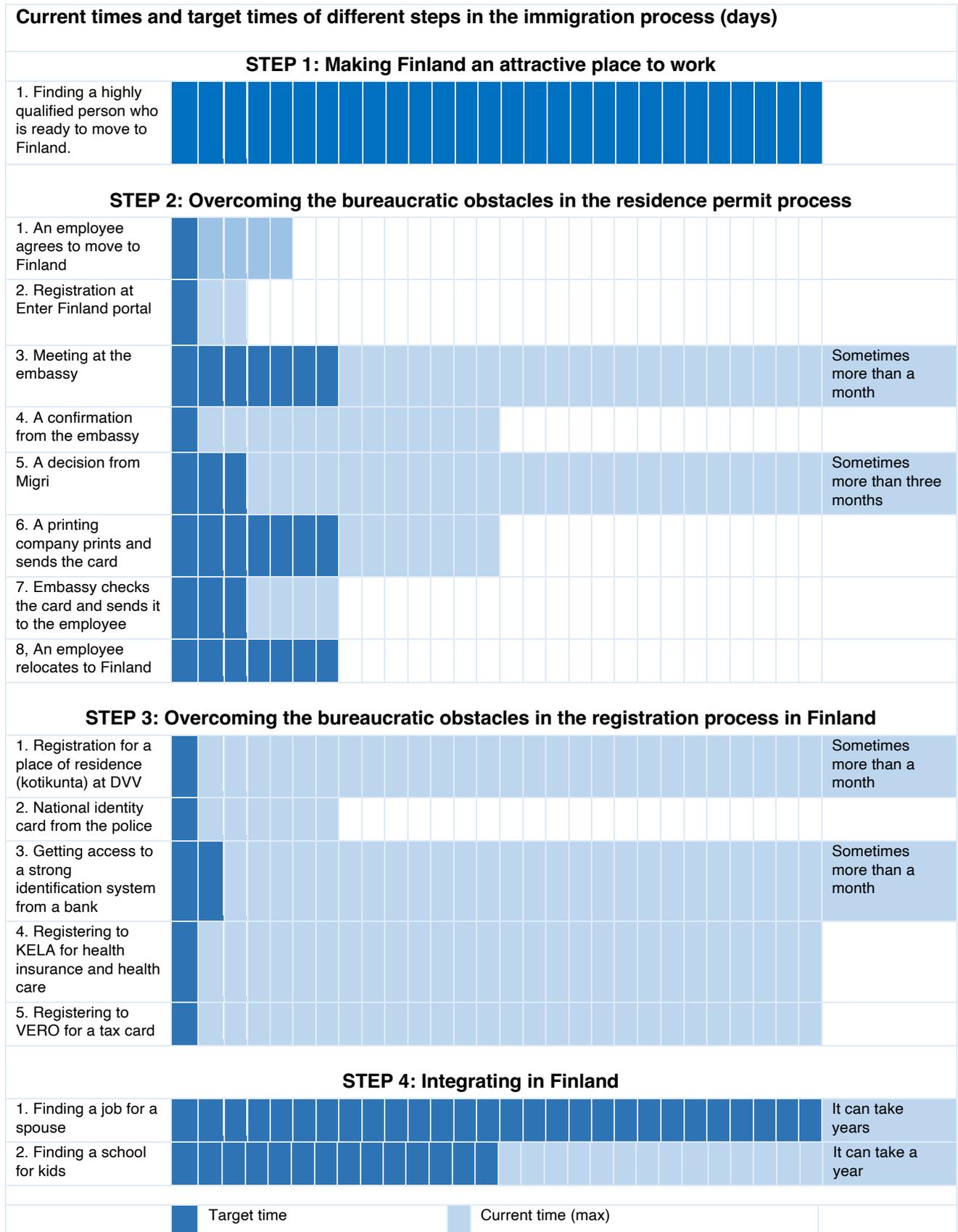
Finland is globally a highly attractive games industry hub, and the country must secure its access to global talent. Otherwise, Finnish studios are forced to open studios abroad.

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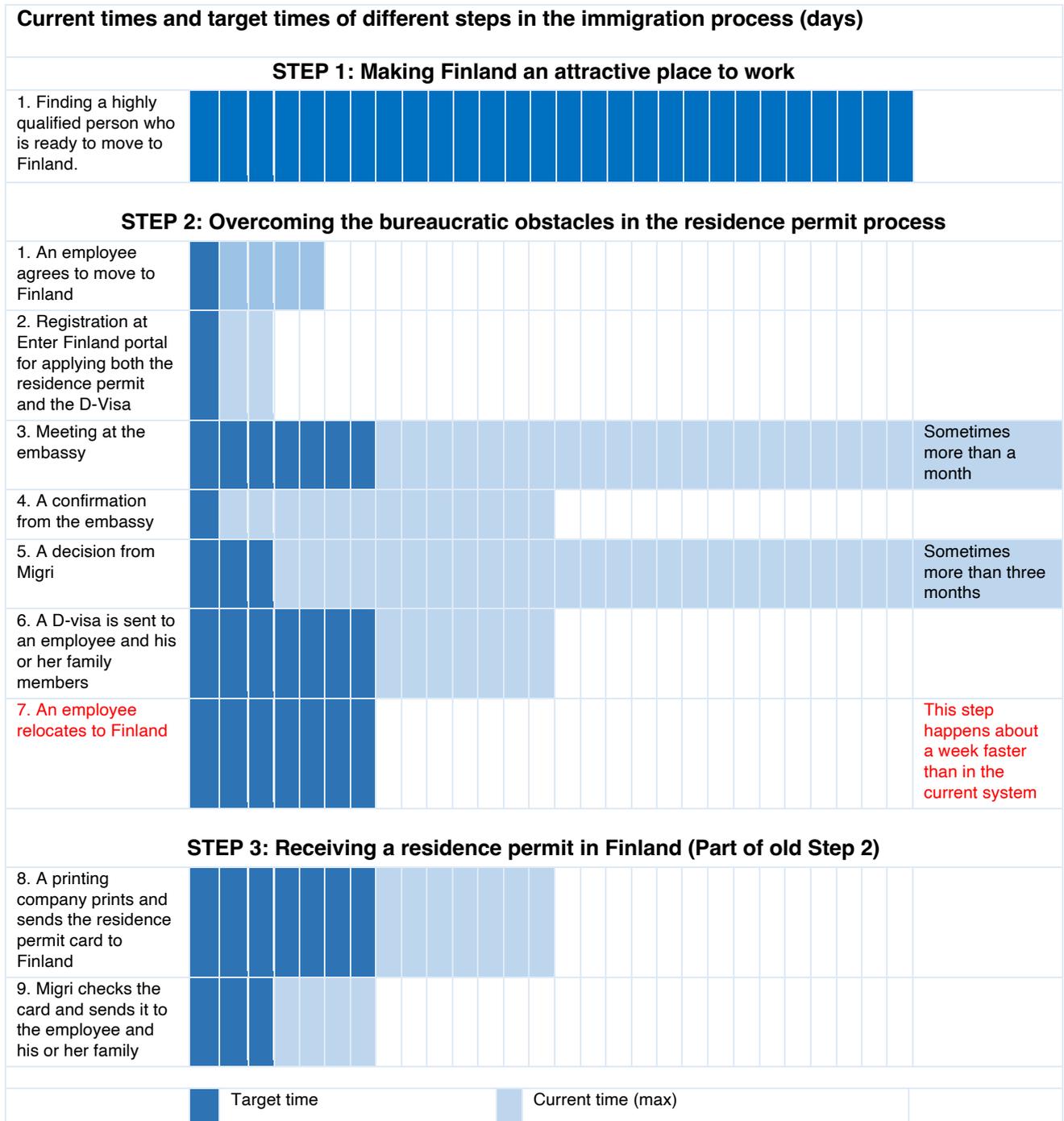
¹ For more information please visit:
<https://www.playfinland.fi/developers-diversity>

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



D-visa

What is the government proposing?



How should the D-visa work?

Current times and target times of different steps in the immigration process (days)		
STEP 1: Making Finland an attractive place to work		
1. Finding a highly qualified person who is ready to move to Finland.		
New STEP 2: A D visa for a job interview and immigration to Finland		
1. Registration at Enter Finland portal		
2. A meeting for submitting the D-Visa application at the embassy		Sometimes more than a month for a Schengen Visa
3. A decision on D-Visa		Sometimes more than a month for a Schengen Visa
4. A D-visa is sent to an employee and their family members		
5. A potential employee and their family flights to Finland		
6. A job interview and a tour in a possible new home town		
7. A potential employee flies back home to wait for a job offer		
8. A new employee and their family moves to Finland		This step happens at least a month faster than in the current system
STEP 3: Receiving a residence permit in Finland (Old Step 2)		
3. Meeting at Migri		Sometimes more than a month
5. A decision from Migri		Sometimes more than three months
6. A printing company prints and sends the card		
7. Migri checks the card and sends it to the employee and their family		

What does this mean in practice? Examples from the immigration process

Case 1: When everything works, it takes only two months

Date:	Action taken
19.8.2020	A new employee of a game developer studio starts the relocation process in the Enter Finland portal
18.9.2020	An appointment in the Finnish Embassy in Moscow
21.9.2020	An approval from Migri
29.9.2020	The employee collects the residence permit card from the embassy
6.10.2020	A person arrives in Finland
30.11.2020	The immigration process is fully completed (including DVV registration, bank account, identity card, KELA card and tax card)

Case 2: When Migri does not have sufficient resources:

Date:	Action taken
17.4.2019	Relocation partner contacts the employee for the first time after the employment contract is signed.
28.5.2019	Submitting and paying for online applications in Enter Finland. Issues on finding a time slot in New Delhi for the Finnish Embassy. First appointment is on July 9th.
10.6.2019	The appointment slot opens for an earlier date, books that
12.6.2019	Appointment at VFS Application Center in India
15.7.2019	Application in Enter Finland still showing "waiting for processing"
17.7.2019	Relocation partner calls to immigration service. They said they would make a note that they've been contacted
23.7.2019	Game developer studio sends a speed up request to relocation partner and they forward that to immigration service
2.8.2019	Immigration Service has confirmed receiving the speed up request. If it has any effect on the processing of your permits, they did not mention.
13.8.2019	Working contract starts , relocation partner calls to Migri to discuss the application. They confirmed that the processing queues are still around 4 months long, meaning that it's still likely to take one more month before the employee will get the decisions to your applications.
23.8.2019	After waiting more than two months, the employee receives a letter to submit additional documents for their cohabitation. The rent agreement document was only attached to the partner's application and not the employee's application so the employee added the rental agreement also to his application. Relocation partner contacts the immigration office and explains that nothing else than the rental agreement is available and asked if letters by family members would help. Immigration office didn't promise at all they would, but now that the applications are this close to the decisions, our relocation partner suggested anyway attach the letters as well. On the same day, they received the same letter again (probably because the rental agreement wasn't enough), and then they sent the letters from the family members alongside with a statutory declaration from the employee stating that they have lived together. Our relocation partner commented that The Finnish Immigration Service unfortunately has very uneven service and that this is the first time she has seen such a request after already submitting a rental agreement as proof of cohabitation.
24.8.2019	Relocation partner discussed with Migri about the case and tries to explain that in India any other documentation than lease agreement can be difficult to obtain and that Employee has provided the strongest proof that they have about cohabitation.
30.8.2019	After almost 3 months, still no decision done.

Case 3: When Migri does not have sufficient resources:

Date:	Action taken
22.5.2019	Relocation partner contacts the employee for the first time after the employment contract signed.
5.6.2019	Employee visits the embassy in Ukraine
26.8.2019	After waiting almost two months , employee receives a supplement request to add: 1) Transcript of records concerning degree from university, how many years of studies does the degree take. 2) CV and related employment certificates. The relocation partner comments that the request is peculiar, as the employee has already submitted his university diploma.
1.8.2019	Working contact starts
30.8.2019	After almost 3 months, still no decision done.

Case 4: When Migri goes over bureacratic

Date:	Action taken
22.7.2019	The employee of a big publicly listed company initiates permit renewal
7.8.2019	HR receives a request from TE-office to provide additional information Certificates from insurance company about our insurances, contract of occupation healthcare service, basis for determining pay and a new TEM054 form filled by someone who has signing rights based on Suomen Asiakastieto Oy, meaning the president of the board, CEO or two board members.
12.8.2019	HR provides the requested documents & information to TE-office.
30.8.2019	No decision done yet

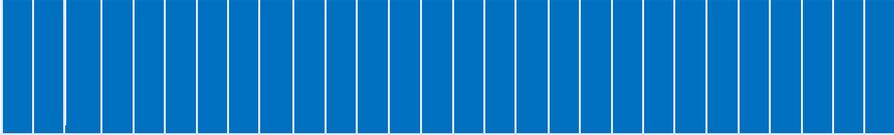
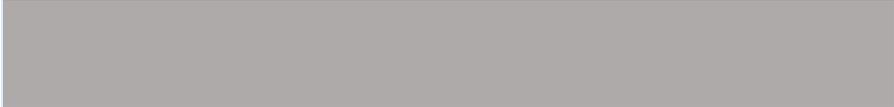
How to Optimize the Finnish Immigration Process for Highly Qualified Specialists?

In general

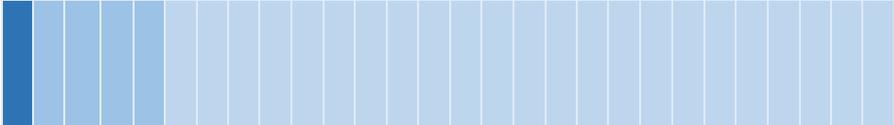
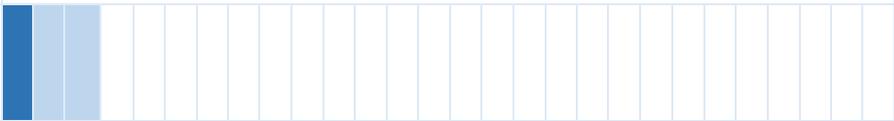
- **Focus on games industry:** The Finnish game industry is the most significant cultural export sector in Finland. Altogether, 13% of the Finnish games industry employees came from outside the EU/ETA area (10 % in 2018), and most of them are working for Finnish studios in Finland. Finland is globally a highly attractive games industry hub, and it has to secure its access to global talent or Finnish studios are forced to open studios abroad.
- **Less talk and more action and reliability:** The challenges of the Finnish immigration system have already been documented by several public and private studies and reports. Now is the time for the government to act and build an immigration system that companies can rely on.
- **Buck-passing has to end:** All actors in the decision-making chain should trust 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 must have clear, coherent and correct information on all steps in the decision-making chain from one website.
- **A single digital service to unite them all:**
 - o **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.
 - o **One-stop-shop:** All services for employees immigrating to Finland should be available from Talent Finland "one-stop shops".
 - o **A single online access point for all information on immigrating in Finland:** All the information from the whole immigration process and a clear checklist for each step from an embassy to tax registration should be centralized on a single website.
 - o **A strict once-only principle for the process:** *Ulkomaalaisrekisterilaki* has to be built future-proof 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. The identification at embassy should be the only time an applicant needs to be identified during the whole immigration process.
 - o **Single and more accessible immigration application system:** 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 for 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.
 - o **A 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 the government to follow actual decision-making times instead of just small parts of them.
 - o **Preliminary ID-number and conditional decisions:** All applicants should be automatically granted a preliminary ID number that can later be transformed to an official one. The system should allow making conditional decisions that are automatically carried out when all required preceding decision-making steps have been carried out.
 - o **Good service design:** Ministry of Employment and Economy (TEM) has to take responsibility of the whole immigration process, not just small parts of it. In practice, Migri's InLand team should be responsible for the service design of the whole immigration process from an embassy to Vero.
- **One month processing time as a cross-governmental policy goal for the whole process, not just for Migri:** The whole process from step 2 to the end of step 3 in this document should not take longer than one month. This requires
 - o **Sufficient resources for quick and reliable decision-making.** The decision-making chain has to work also during both holiday seasons (summer) and rush times (when new students or seasonal workers arrive in Finland). It should not take more than three days to get a decision from Migri. If needed, the summer holidays of Migri should be moved to less busy season, as July and August are the most busy immigration seasons (e.g. seasonal workers and international students).
 - o **A more standardized and predictable process:** Additional documents should be needed only in rare cases. Migri should have a clear understanding of the background of the applicant. The fact that all documents are not available in all countries should not become an obstacle for immigration. The decisions should not depend on the person who is processing the application
 - o **Each day matters:** each step of the process needs to be streamlined
 - o **Cutting onsite meetings to the bare minimum:** Migri, for example, should by default organize all meetings with people prolonging their residence permits online. As identification is already made at this stage, there is no need for an onsite appointment.

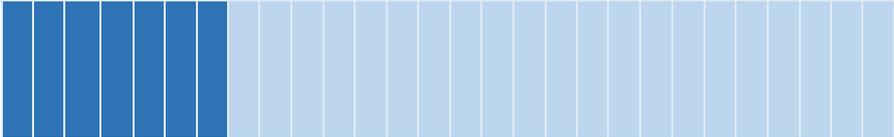
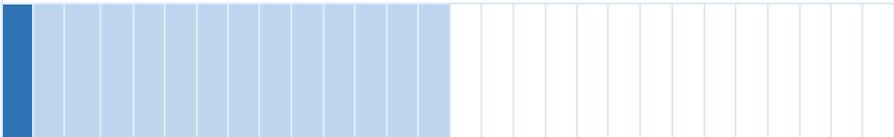
- **Better communication and sufficient resources for translation services:** Proactive communication about the time it takes to process applications would significantly help to start other immigration processes in time. All actors in the decision-making chain should have sufficient resources for providing clear information on the immigration process in English

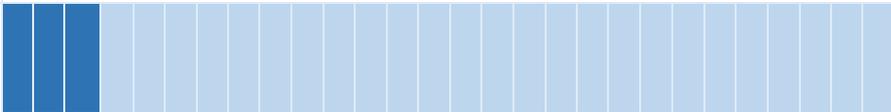
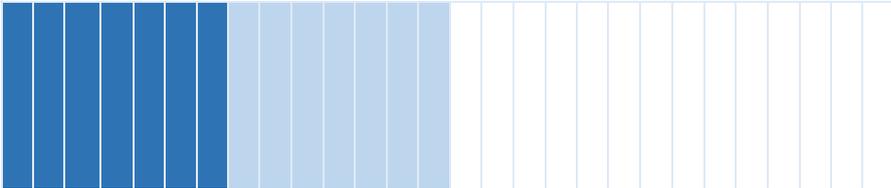
Targeted times of different steps in the immigration process (days)

Targeted times of different steps in the immigration process (days)	
	Target time
STEP 1: Making Finland an attractive place to work	
1. RECRUITMENT Finding a highly qualified person who is ready to move to Finland	
	It can take from months to years
	<p>What: Marketing Finland as an attractive place to work</p> <p>Solutions:</p> <ul style="list-style-type: none"> - Cities, TEM and UM should build a joint approach to international talent attraction on an ecosystem level instead of competing regional initiatives. Instead of having several different competing initiatives and brands for talent attraction, the regions should focus on building joint ones for each national industry ecosystem (e.g. games industry). - Cities, TEM and UM should provide sufficient resources for marketing and branding. Talent Finland has to have adequate resources for successful nation branding in co-operation with cities. The continuous global presence of Finland in international media and key industry events is crucial. - Cities and UM need to provide Marketing material. Game developer studios need 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. - UM and Migri have to introduce a toolbox for international recruitment. Toolbox helping Finnish companies to tackle the immigration process. - TEM should not forget exception management. Business Finland should support companies in building up exception management strategies
2. REMOTE WORK Working remotely cross border	
	<p>As an outcome of the COVID19 outbreak, the number of employees working over distance to Finland and from Finland is likely to increase as companies make remote working a permanent practice in their organization.</p> <p>Solution:</p> <ul style="list-style-type: none"> - VM and TEM should provide clear guidance on working remotely from Finland or to Finland. The guidance document should help companies allowing their employees to work over distance from third countries and the companies that want to enable their staff to work from Finland as remote workers. The government should pay particular attention to and minimize the potential risks emerging from creating accidentally permanent establishment for corporate taxation purposes and how to map the potential impact of Finnish social security benefits for the remote working employee.

STEP 2: Overcoming the bureaucratic obstacles in the residence permit process (max 30 days)

<p>1. A CONTRACT A new employee agrees to move to Finland</p>		<p>Now: It can take months Target: 0 days</p>
<p>The reason for the delay: Getting a VISA for a job interview takes a long time because posting physical copies of signed documents from an employee to an embassy and an employer.</p> <p>Solution:</p> <ul style="list-style-type: none"> - TEM should introduce a visa for a job interview. To speed up the process of getting a Schengen Visa for job interviews, a normal tourist visa should be enough to enter the country. Alternatively, the Finnish government should introduce a specific type of new visa (so-called D Visa) for job interviews and working temporarily in Finland that could later be transformed to a specialist residence permit. - VM and UM should work to build a global eSignature system. The embassy should always accept electronic signatures from trusted countries. In the long run, a global system for electronic signatures is needed. 		
<p>2. A REGISTRATION at Enter Finland Portal</p>		<p>Now: few days Target: 0 days</p>
<p>The reason for the delay: The employee is struggling with misleading information on Enter Finland Portal while submitting the electronic application</p> <p>Solution:</p> <ul style="list-style-type: none"> - UM and Migri should introduce checklists. Migri and UM should provide clear checklists and easy to understand animated videos on how to apply for a residence permit in different cases. - UM and Migri have to provide correct information. Removing misleading information from the website (e.g. can one first come to Finland with an existing Schengen Visa and apply for 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 the 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. - Migri should provide low-threshold professional support for relocation experts: Migri should run a social media group (e.g. on Facebook or LinkedIn) to inform HR specialists on changes in the immigration process and reply to questions. - Migri should update its payment system. 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. - Migri should automatically upload employer information. The employer's information should be transferred automatically to the application with the VAT number. The employer should be immediately notified of incomplete application so that they can fill in the Principal terms and conditions of Employment on the applicant's behalf. 		

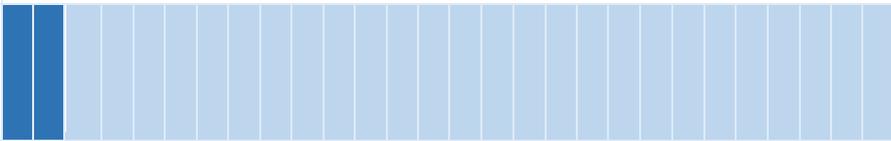
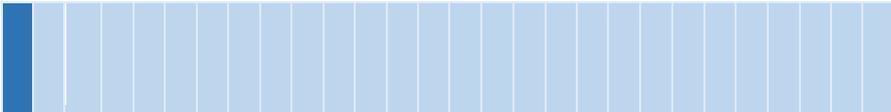
	<ul style="list-style-type: none"> - Migri should introduce a tracking system. A tracking system needs to be build so that the employee can track the status of their application through the whole process from the embassy to Migri and back. - Migri, DVV and KELA should introduce one application for the whole family. If the specialist moving to Finland has family members, they can apply for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application. - UM should introduce a call-back service. If problems should occur, the embassy should call the employer for clarification 	
3. AN APPOINTMENT at an embassy		Now: From few days to weeks Target: an appointment in 1 week,
	<p>The reason for the delay: There have been significant delays in getting a timeslot from the embassy for identification and submitting the application (fingerprints). Due to poor public procurement practices, outsourcing administrative work from embassies to external third parties has caused significant new delays. Travelling from a state of residence to an embassy causes harmful emissions and, in many cases, slows the process down significantly.</p> <p>Solution:</p> <ul style="list-style-type: none"> • UM should level up its public procurement standards. Finnish embassies have outsourced their administrative processes related to residence permit applications to external service providers. In practice, this has led to a situation where an appointment that would take 30 minutes at Migri in Finland takes up two and a half hours at outsourced service providers. Furthermore, the outsourced service providers have failed to collect necessary documents from applicants, lost ID photos, and their machines for collecting biometric data have been broken. The broken administrative process has led to multiple visits and unnecessary time away from school for children and work for a spouse. The goal of outsourcing should be to make the process more effective, not cut costs by making the process less reliable. • A strict once-only principle for the process (UM, Migri and DVV): The identification at embassy should be the only time an applicant needs to be identified during the whole immigration process. • EU needs to introduce a European standard for identifying a person, and UM should seek synergies through co-operation with other EU/Nordic countries. In the long run, UM should secure that the identification can occur in an embassy closest to the applicant in co-operation with other EU/Nordic embassies. • UM should introduce a Universal Digital Finnish Embassy <ul style="list-style-type: none"> ○ Universal Digital Embassy should be established so that the applicants wouldn't have to travel to a physical embassy. ○ Video appointments should be made available when possible. 	
4. A CONFIRMATION from the embassy		Now: From few days to weeks Target: an approval in 1 day
	<p>The reason for the delay: Delays in getting a confirmation from the embassy to Migri for starting the application review process</p> <p>Solutions:</p> <ul style="list-style-type: none"> - VM and UM should secure sufficient human resources for embassies to process the applications. The embassy must have enough human resources confirm the application within one day from the appointment 	

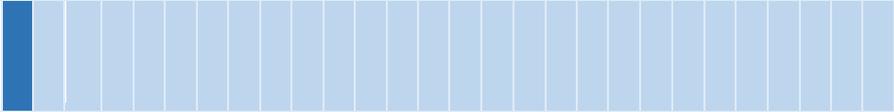
	<ul style="list-style-type: none"> - UM should make the system more accessible in local languages. The electronic systems for handling the residence permit applications should be accessible in a local language or at least in English so that embassies can hire and train local staff for processing the applications - UM should level up its public procurement standards. The use of outsourced services like VFS for processing the applications should not create an extra lag to the process. Currently, applicants might need to wait for two months to have an appointment from outsourced service provider. 	
5. A DECISION from Migri		Now: from few days to months Target: 3 days
	<p>The reason for the delay: Migri is under-resourced to process the applications on time, especially during peak months and holiday seasons</p> <p>Solution:</p> <ul style="list-style-type: none"> - VM, UM and SM have to secure sufficient resources for Migri. Migri must have adequate human resources to process the applications in 3 days, even during the busy and holiday seasons. If needed, the summer holidays of Migri should be moved to less busy season, as July and August are the most busy immigration seasons (e.g. seasonal workers and international students). 	
6. THE RESIDENCE PERMIT CARD Printing and sending the residence permit card		Now: About 2 weeks Target: 1 week
	<p>The reason for the delay: A company subcontracted to print the residence permit card and send it to the embassy. Printing and mailing the printed card takes too long.</p> <p>Solution:</p> <ul style="list-style-type: none"> - VM, SM and Migri should secure sufficient resources for printing the cards. The government should introduce more resources for the printing company for printing and sending the cards quicker. 	
7. A CHECK The embassy checks the card and sends it to the employee		Now: About a week Target: 3 days
	<p>The reason for the delay: Delays in checking the card and sending the card to an applicant or asking the applicant to collect the card from the embassy</p> <p>Solutions:</p> <ul style="list-style-type: none"> - Migri should update its payment service. The applicant should be allowed to pay the posting costs already when the residence permit application is submitted. There should be a way for the company to pay these costs directly. - VM and UM should secure sufficient resources for embassies for delivering the cards smoothly. The embassies must have enough human resources to process the residence permit cards in one day - UM, TEM and Migri have to secure functional delivery: <ul style="list-style-type: none"> o 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 must inform all applicants about this possibility clearly. o The embassy must have access to a system that automatically sends a notification to the employee waiting for the residence permit card to arrive, when the card arrives at the embassy and when they can come to collect it, or it has been sent forward from the embassy to the employee. 	

	<ul style="list-style-type: none"> ○ In the long run, <i>Ulkomaalaislaki</i> must be amended so that residence permit cards can be sent directly to the employee from the manufacturer in countries where the post system allows this. - UM and TEM should introduce a welcome to Finland box. In addition to official immigration documents, everyone moving to Finland should receive an official Welcome Box welcoming them to the country and informing the applicant about the next steps of the immigration process, including a reminder of their responsibility to notify Migri of all status changes immediately. 	
<p>8. A RELOCATION The employee moves to Finland</p>		<p>Now: About a week</p>
<p>The reason for the delay: Booking the tickets and flying to Finland</p>		

STEP 3: Overcoming the bureaucratic obstacles in the registration process in Finland (max 5 days)

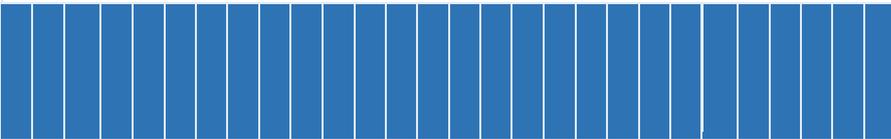
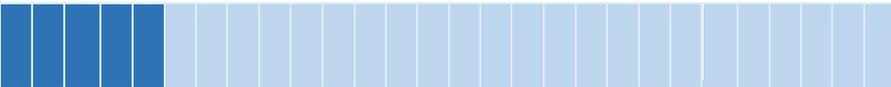
<p>1. A PLACE OF RESIDENCE Registration for a place of residence (kotikunta) at DDV</p>		<p>Now: can take months Target: 0 days</p>
	<p>The reason for the delay: The employee must go physically to the local register office (DDV) to register her or himself for an official place of residence (kotikunta). Finnish post service works slower and slower, which causes delays in sending and receiving the applications.</p> <p>Solutions:</p> <ul style="list-style-type: none"> — DVV should make its services more accessible in English. The local register office (DDV) should accept English as transaction language (SOLVED) - VM should update Kotikuntalaki 1993/201 4§. One year contract should be enough for registration. Currently, a person must have a residence permit for at least one year but an employment contract for at least two years for the registration. As only a one-year residence permit is required, also only one year contract should be enough. - VM should secure sufficient resources DVV: DVV should have adequate human resources to process an application in one day. - VM, Migri, and DVV should implement the ask only once principle. All data should be automatically moved from the residence permit database to the Population information system, including information on children and a spouse. For this reason, Ulkomaalaisrekisterilaki has to be amended so 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. - DVV should introduce smart, automated decision-making. The registration should be done electronically and automatically at the moment the residence permit is granted. In the short run, DVV must have sufficient human resources for processing the applications quickly under all circumstances. In the long run, purely administrative decisions should be made by algorithms controlled by competent public officials with clear liability. - DVV should make its online services accessible without access to an online banking account for strong identification purposes. DVV should secure access to a fully electronic service also for those who do not have access to a strong electronic identification system (e.g. the decision would be accessible online with a password given to the employee when they register in DVV) - Migri, DVV and KELA should introduce one application for the whole family. If the specialist moving to Finland has family members, they can apply for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application. 	

2. A NATIONAL IDENTITY CARD from police		Now: a week Target: 0 days
	<p>The reason for the delay: An employee must be reidentified for a national identity card by the police.</p> <p>Solutions:</p> <ul style="list-style-type: none"> - SM, Migri and Police should secure a functional delivery of the identity card by <ul style="list-style-type: none"> o Implementing an ask only once principle. The information for the national identity card should be automatically transferred from the residence permit application o Allowing preordering the national identity card. The person should be allowed to preorder the national identity card already when they submit the residence permit application - Police, SM and Migri should trust UM identification. For persons from trusted countries, the identification done at the embassy should be enough. 	
3. AN ACCESS TO A STRONG IDENTIFICATION SYSTEM from a bank		Now: can take months Target: 1-3 days
	<p>The reason for the delay: A person needs a national identity card to get online banking accounts from a bank, which are required to get access to a strong identification system allowing them to access public services online. After EU directives forced banks to provide strong identification services to all people staying in Finland, the waiting times for having an appointment to open a bank account have increased significantly. Under-resourced banking services have dramatically increased the time it takes for immigrants to access strong identification services and caused significant problems for paying salaries.</p> <p>Solutions:</p> <ul style="list-style-type: none"> - VM and FIN-FSA should secure access to basic banking services in a reasonable time. If nothing else works, the new government has to propose a maximum three day processing time for accessing banking and identification services. - VM and FIN-FSA update their guidance on identifying the bank customers. Banks should not require a national identity card for granting access to a strong online identification system. A passport and approved residence permit (printing and mailing the actual residence permit takes time) should be enough. 	
4. HEALTH INSURANCE AND PUBLIC HEALTH CARE from KELA		Now: About 1 month Target: 0 days
	<p>The reason for the delay: Delays in the registration process in KELA</p> <p>Solutions:</p> <ul style="list-style-type: none"> - VM, KELA and Migri should streamline the KELA card application process. The employee should be allowed to apply for health insurance while filling the residence permit application. - VM and KELA should commit to an ask only once principle. 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. - VM and STM should secure sufficient resources for KELA. KELA has to have adequate resources for processing the applications. KELA Card and European Health Insurance Card should not take six months to arrive. - KELA should make its services more accessible to foreigners. Essential information about the health insurance decision should be available in English. - Migri, DVV and KELA should introduce one application for the whole family. If the specialist moving to Finland has family members, they can apply 	

	<p>for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application.</p>	
<p>5. A TAX CARD Registering to the tax authority for a tax card</p>		<p>Now: 0 days to weeks Target: 0 days</p>
	<p>The reason for the delay: An employee must register to VERO for taxation. However, for foreign specialists/key employees, only the capital region can offer fast tax administration services, as the tax administration is familiar with international taxation practices. 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. Until an employee gets a tax card, companies are forced to withhold 60% income tax from their salary.</p> <p>Solutions:</p> <ul style="list-style-type: none"> - VM, VERO and Migri should streamline the tax card application process. One should be able to apply for a tax card already while applying for the residence permit - VM and VERO should commit to an ask only once principle. All information submitted in the residence permit application should be automatically uploaded to a tax card. 	

STEP 4: Integrating in Finland

1. A NEW HOME Starting a new life in Finland		
	<p>Solutions:</p> <ul style="list-style-type: none"> - VM should abandon immigration tax. Vero should not consider immigration costs paid by the employer taxable personal income at all. 50% reduction is not enough for families immigrating from overseas. All immigration-related expenses paid by the employee should be deductible from personal income tax (also Finnish ID card). - VM should introduce a tax exemption for language courses paid by employers. Vero should consider language courses paid by an employer for their employees or their family members as taxable income in personal taxation. - Cities should fight racism: Sometimes, people of colour face open racism in Finnish society. Finnish cities must take action to fight racism in all areas of society. - Cities, DVV, VERO, Police and Kela should make their services more accessible for non-Finnish or Swedish speakers. All key public services should be available in English - Cities should provide an immigration toolbox. A toolbox should include information about finding a flat, hobbies etc. 	
2. A SPOUSE Finding a job for a spouse		Now: 1 month to years Target: half a year
	<p>The reason for the delay: If the employee's spouse cannot come to Finland or find a job, the family will likely leave Finland.</p> <p>Solutions:</p> <ul style="list-style-type: none"> - Migri, UM and TEM should secure that the residence permit process does not separate families. Migri, UM and TEM should minimize the evidence requirements for proving that two persons have lived together. - Cities, VM and TEM should not build one size fits all solution for integration education. Integration education must be a flexible framework, where public and private services providers (integration education provided by employers such as Finnish language classes) complement each other. - VM should not consider language courses paid by an employer for spouses as a taxable income for an employee. Suppose companies want to provide part of mandatory integration education for their employees and their spouses and other family members. In that case, they should be allowed to do so without the cost being calculated as taxable income for the employee, and it should be a deductible cost to the employer. - Cities, Migri, VERO, KELA and DVV should provide a single point of contact. Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible. - Cities (and TEM) must provide better, more accessible, and targeted employment services <ul style="list-style-type: none"> o Cities should build well-resourced Talent Finland Hubs in all key game dev hubs in Finland o A too strict focus on vocational training among immigrants quickly leads to a failure to explore the full potential of immigrants with academic backgrounds. The academically educated foreign workforce in the Finnish job market, initially arriving in Finland as spouses of a person employed in Finland, should be a special focus area of public services 	

	<ul style="list-style-type: none"> ○ Cities should have at least one service point where specifically trained personnel for highly educated foreigners are available ○ Integration plans (kotoutumissuunnitelma) should be more thought over, longer, and have more detail. ○ Waiting time from public employment service evaluation to actual integration plan steps, such as language course placement, should be cut from several months to a maximum of one month. ○ Cities should explain the rules of the Finnish labour market to all clients. ○ All public employment services should offer online services in English. ○ Cities should provide dedicated support services for spouses locating in Finland. The International Talents Accelerating Growth project run by Helsinki is an excellent example of services needed: networking, mentoring, etc. Cities should provide support activities of this kind in other languages than English as well. 	
3. CHILDREN Finding a school for kids		Now: from 1 month to 1 year Target: 1 month
	<p>The reason for the delay: For example, there are not enough places for children in public schools providing education in English, Spanish or Russian in Helsinki. Finland is well known for its excellent free primary education. It is often a huge disappointment when cities force children with an immigrant background to enroll in private schools with huge tuition fees. In the worst case, a child does not pass the entrance examination to a school (e.g. SYK in Helsinki), and she or he is forced to use a year to study Finnish to be able to enroll in a Finnish school. Limited access to primary and secondary education is particularly challenging for children in the older end of compulsory education. Furthermore, there is a lot of misinformation about the enrollment system.</p> <p>Solution:</p> <ul style="list-style-type: none"> - TEM, SM and UM should not separate high school students from their families. Currently, the residence permit process might force parents to leave their children behind if they are over 18 years old. The Finnish government should raise this age limit to 20 years to secure those children can live with their families until they have finalized secondary education. - Cities should secure accessible education. Cities must open more places in schools providing pre-school, primary and secondary education in other languages than Finnish or Swedish. 	
4. RENEWING A RESIDENCE PERMIT		Now: months Target: 1 week
	<p>The reason for the delay: Due to insufficient resources, it can take months for Migri to renew a residence permit.</p> <p>Solution:</p> <ul style="list-style-type: none"> • VM should secure sufficient resources for decision making in Migri and DVV: the government needs to immediately allocate adequate resources for quick and reliable decision-making in Migri (renewing residence permits) and DVV (registering EU citizens). • VM should not allow banks to kick out immigrants waiting for Migri to renew their residence permits. Some banks require a valid residence permit for accessing their banking services. As it takes a long time for Migri to renew residence permits, banks have asked some Finnish game developer studio employees with expired residence permits to remove their money from a bank before the bank closes their bank account. • Migri and UM should always provide correct and clear information. Migri and UM should remove all misleading and unclear information from their websites. For example, it is unclear if employees are allowed to participate in international games industry events outside the Schengen area while their residence permit is under review. 	

	<ul style="list-style-type: none"> • Migri and TEM should not create a black market for residence permit appointments. The best way to avoid the black market is to secure that there are always some free appointment times available, as it would secure that there is no need for appointment hoarding. When it is difficult to get appointments from Migri for renewing the residence permits, a black market for them will emerge. For more information (in Finnish) https://yle.fi/uutiset/3-11525250 • Migri should cut onsite meetings to the bare minimum. Migri should organize all meetings with people prolonging their residence permits as online meetings. Migri has already identified everyone extending a residence permit, so there is no need for an onsite appointment. 	
<p>5. FINDING A NEW JOB Finding a new job from Finland after layoffs</p>		
	<p>TEM and Migri should not throw laid-off talent out of the country. The games industry is a hit-driven business. It is usual for game developer studios to recruit new talent while their sales are booming and lay off people when the sales stall. Now, laid-off non-EU specialists are encouraged to leave the country.</p> <p>Solution:</p> <ul style="list-style-type: none"> - TEM should introduce a new residence permit for highly skilled specialists looking for a new job in Finland. To secure those talented employees stay in the country, laid off specialists should be allowed to apply for similar residence permits for looking for a job as recently graduated international students. 	

ANNEXES

Annex 1: Abbreviations

EU Euroopan unioni / the European Union

Finnish Ministries

SM Sisäministeriö / Ministry of the Interior of Finland
STM Sosiaali ja terveysministeriö / Ministry of Social Affairs and Health of Finland
TEM Työ- ja elinkeinoministeriö / Ministry of Labour and Livelihood of Finland
UM Ulkoministeriö / Ministry of Foreign Affairs of Finland
VM Valtiovarainministeriö / Ministry of Finance of Finland

Governmental Agencies

DVV Digi ja väestötietovirasto (ent. maistraatti) / Digital and Population Services Agency (former magistrate) of Finland
Migri Maahanmuuttovirasto / Finnish Immigration Service
KELA Kansaneläkelaitos / Social Insurance Institution of Finland
VERO Verohallinto/ Finnish Tax Authority
FIN-FSA Finanssivalvonta / Financial Supervisory Authority of Finland

Annex 2: A to do list for cities

1. Making Finland an attractive place to work

Finding a highly qualified person who is ready to move to Finland

- **Cities, TEM and UM should build a joint approach to international talent attraction on an ecosystem level instead of competing regional initiatives.** Instead of having several different competing initiatives and brands for talent attraction, the regions should focus on building joint ones for each national industry ecosystem (e.g. games industry).
- **Cities, TEM and UM should provide sufficient resources for marketing and branding.** Talent Finland has to have adequate resources for successful nation branding in co-operation with cities. The continuous global presence of Finland in international media and key industry events is crucial.
- **Cities and UM need to provide marketing material.** Game developer studios need 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.
- **Cities in the capital region need a single brand:** To improve the global attractiveness of the capital region, it must operate under a single unified Helsinki brand.

2. Integrating in Finland

Starting a new life in Finland

- **Cities should fight racism:** Sometimes, people of colour face open racism in Finnish society. Finnish cities must take action to fight racism in all areas of society.
- **Cities, DVV, VERO and Kela should make their services more accessible for non-Finnish or Swedish speakers.** All key public services should be available in English
- **Cities should provide an immigration toolbox.** A toolbox should include information about finding a flat, hobbies etc.
- **Cities, VM and TEM should not build one size fits all solution for integration education.** Integration education must be a flexible framework, where public and private services providers (integration education provided by employers such as Finnish language classes) complement each other.

Finding a job for a spouse

- **Cities, VM and TEM should not build one size fits all solution for integration education.** Integration education must be a flexible framework, where public and private services providers (integration education provided by employers such as Finnish language classes) complement each other.
- **Cities, Migri, VERO, KELA and DVV should provide a single point of contact.** Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible.
- **Cities (and TEM) must provide better, more accessible, and targeted employment services**
 - o Cities should build well-resourced Talent Finland Hubs in all key game dev hubs in Finland
 - o A too strict focus on vocational training among immigrants quickly leads to a failure to explore the full potential of immigrants with academic backgrounds. The academically educated foreign workforce in the Finnish job market, initially arriving in Finland as spouses of a person employed in Finland, should be a special focus area of public services
 - o Cities should provide dedicated support services for spouses locating in Finland. The International Talents Accelerating Growth project run by Helsinki is an excellent example of services needed: networking, mentoring, etc. Cities should provide support activities of this kind in other languages than English as well.
 - o Cities should have at least one service point where specifically trained personnel for highly educated foreigners are available
 - o Integration plans (kotoutumissuunnitelma) should be more thought over, longer, and have more detail.
 - o Waiting time from public employment service evaluation to actual integration plan steps, such as language course placement, should be cut from several months to a maximum of one month.
 - o Cities should explain the rules of the Finnish labour market to all clients.
 - o All public employment services should offer online services in English.
 - o Cities should provide dedicated support services for spouses locating in Finland. The International Talents Accelerating Growth project run by Helsinki is an excellent example of services needed: networking, mentoring, etc. Cities should provide support activities of this kind in other languages than English as well.

Children

- **Cities should secure accessible education.** Cities must open more places in schools providing pre-school, primary and secondary education in other languages than Finnish or Swedish.

Annex 3: A to do list for DVV

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.²

2. Overcoming the bureaucratic obstacles in the registration process in Finland

Registration for a place of residence (kotikunta) at DDV

- **VM, UM, Migri, and DVV should implement the ask only once principle.** The identification at embassy should be the only time an applicant needs to be identified during the whole immigration process. All data should be automatically moved from the residence permit database to the Population information system, including information on children and a spouse. For this reason, Ulkomaalaisrekisterilaki has to be amended so 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.
- **DVV should introduce smart, automated decision-making.** The registration should be done electronically and automatically at the moment the residence permit is granted. In the short run, DVV must have sufficient human resources for processing the applications quickly under all circumstances. In the long run, purely administrative decisions should be made by algorithms controlled by competent public officials with clear liability.
- **DVV should make its online services accessible without access to an online banking account for strong identification purposes.** DVV should secure access to a fully electronic service also for those who do not have access to a strong electronic identification system (e.g. the decision would be accessible online with a password given to the employee when they register in DVV)
- **Migri, DVV and KELA should introduce one application for the whole family.** If the specialist moving to Finland has family members, they can apply for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application.

3. Integrating in Finland

Starting a new life in Finland

- **Cities, DVV, VERO and Kela should make their services more accessible for non-Finnish or Swedish speakers.** All key public services should be available in English

Finding a job for a spouse

- **Cities, Migri, VERO, KELA and DVV should provide a single point of contact.** Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible.

Annex 4: A to do list for Migri

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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

2. Making Finland an attractive place to work

Finding a highly qualified person who is ready to move to Finland

- **UM and Migri have to introduce a toolbox for international recruitment.** Toolbox helping Finnish companies to tackle the immigration process.

3. Overcoming the bureaucratic obstacles in the residence permit process

Registration at Enter Finland Portal

- **UM and Migri should introduce checklists.** Migri and UM should provide clear checklists and easy to understand animated videos on how to apply for a residence permit in different cases.
- **UM and Migri have to provide correct information.** ~~Removing misleading information from the website (e.g. can one first come to Finland with an existing Schengen Visa and apply for 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 the 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.
- **Migri should provide low-threshold professional support for relocation experts:** Migri should run a social media group (e.g. on Facebook or LinkedIn) to inform HR specialists on changes in the immigration process and reply to questions.
- **Migri should update its payment system.** 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.
- **Migri should automatically upload employer information.** The employer's information should be transferred automatically to the application with the VAT number. The employer should be immediately notified of incomplete application so that they can fill in the Principal terms and conditions of Employment on the applicant's behalf.
- **Migri should introduce a tracking system.** A tracking system needs to be build so that the employee can track the status of their application through the whole process from the embassy to Migri and back.
- **Migri, DVV and KELA should introduce one application for the whole family.** If the specialist moving to Finland has family members, they can apply for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application.

The embassy checks the card and sends it to the employee

- **Migri should update its payment service.** The applicant should be allowed to pay the posting costs already when the residence permit application is submitted. There should be a way for the company to pay these costs directly.
- **UM, TEM and Migri have to secure functional delivery:**
 - o 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 must inform all applicants about this possibility clearly.
 - o The embassy must have access to a system that automatically sends a notification to the employee waiting for the residence permit card to arrive, when the card arrives at the embassy and when they can come to collect it, or it has been sent forward from the embassy to the employee.
 - o In the long run, *Ulkomaalaislaki* must be amended so that residence permit cards can be sent directly to the employee from the manufacturer in countries where the post system allows this.

4. Overcoming the bureaucratic obstacles in the registration process in Finland

Registration for a place of residence (kotikunta) at DDV

- **VM, Migri, and DVV should implement the ask only once principle.** All data should be automatically moved from the residence permit database to the Population information system, including information on children and a spouse. For this reason, Ulkomaalaisrekisterilaki has to be amended so 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.

National identity card from the police

- **Police, SM, Migri and Police should secure a functional delivery of the identity card by**
 - o **Implementing an ask only once principle.** The information for the national identity card should be automatically transferred from the residence permit application
 - o **Allowing preordering the national identity card.** The person should be allowed to preorder the national identity card already when they submit the residence permit application
- **Police, SM and Migri should trust UM identification.** For persons from trusted countries, the identification done at the embassy should be enough.

Health insurance card from KELA

- **VM, KELA and Migri should streamline the KELA card application process.** The employee should be allowed to apply for health insurance while filling the residence permit application.

Registering to the tax authority for a tax card

- **VM, VERO and Migri should streamline the tax card application process.** One should be able to apply for a tax card already while applying for the residence permit

5. Integrating in Finland

Finding a job for a spouse

- **Migri, UM and TEM should secure that the residence permit process does not separate families.** Migri, UM and TEM should minimize the evidence requirements for proving that two persons have lived together.
- **Cities, Migri, VERO, KELA and DVV should provide a single point of contact.** Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible.

Renewing a residence permit

- **Migri and UM should always provide correct and clear information.** Migri and UM should remove all misleading and unclear information from their websites. For example, it is unclear if employees are allowed to participate in international games industry events outside the Schengen area while their residence permit is under review.
- **Migri and TEM should not create a black market for residence permit appointments.** The best way to avoid the black market is to secure that there are always some free appointment times available, as it would secure that there is no need for appointment hoarding. When it is difficult to get appointments from Migri for renewing the residence permits, a black market for them will emerge. For more information (in Finnish)
- **Migri should cut onsite meetings to the bare minimum.** Migri should organize all meetings with people prolonging their residence permits as online meetings. Migri has already identified everyone extending a residence permit, so there is no need for an onsite appointment.

Annex 5: A to do list for KELA

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the registration process in Finland

Health insurance card from KELA

- **VM, KELA and Migri should streamline the KELA card application process.** The employee should be allowed to apply for health insurance while filling the residence permit application.
- **VM and KELA should commit to an ask only once principle.** 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.
- **KELA should make its services more accessible to foreigners.** Essential information about the health insurance decision should be available in English
- **Migri, DVV and KELA should introduce one application for the whole family.** If the specialist moving to Finland has family members, they can apply for a residence permit, kotikunta and KELA card at the same time. The goal of the Finnish Immigration Service is to make a decision on the whole family's applications quickly and simultaneously, but this is not always possible. Consequently, instead of submitting different applications, the entire family should apply for residence permits under a single application.

3. Integrating in Finland

Starting a new life in Finland

- **Cities, DVV, VERO and Kela should make their services more accessible for non-Finnish or Swedish speakers.** All key public services should be available in English

Finding a job for a spouse

- **Cities, Migri, VERO, KELA and DVV should provide a single point of contact.** Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible.

Annex 6: A to do list for police

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the registration process in Finland

National identity card from the police

- **Police, SM and Migri should secure a functional delivery of the identity card by**
 - o **Implementing an ask only once principle.** The information for the national identity card should be automatically transferred from the residence permit application
 - o **Allowing preordering the national identity card.** The person should be allowed to preorder the national identity card already when they submit the residence permit application
- **Police, SM and Migri should trust UM identification.** For persons from trusted countries, the identification done at the embassy should be enough.

3. Integrating in Finland

Starting a new life in Finland

- **Cities, DVV, VERO and Kela should make their services more accessible for non-Finnish or Swedish speakers.** All key public services should be available in English

Annex 7: A to do list for VERO

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the registration process in Finland

Registering to the tax authority for a tax card

- **VM, VERO and Migri should streamline the tax card application process.** One should be able to apply for a tax card already while applying for the residence permit
- **VM and VERO should commit to an ask only once principle.** All information submitted in the residence permit application should be automatically uploaded to a tax card.

3. Integrating in Finland

Starting a new life in Finland

- **Cities, DVV, VERO and Kela should make their services more accessible for non-Finnish or Swedish speakers.** All key public services should be available in English

Finding a job for a spouse

- **Cities, Migri, VERO, KELA and DVV should provide a single point of contact.** Cities and national agencies providing immigration services should build well-resourced International Houses, where all immigration services are easily accessible.

Annex 8: A to do list for FIN-FSA

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the registration process in Finland

Access to a bank account and a strong identification system from a bank

- **VM and FIN-FSA should secure access to basic banking services in a reasonable time.** If nothing else works, the new government has to propose a maximum three day processing time for accessing banking and identification services.
- **VM and FIN-FSA update their guidance on identifying the bank customers.** Banks should not require a national identity card for granting access to a strong online identification system. A passport and approved residence permit (printing and mailing the actual residence permit takes time) should be enough.

Annex 9: A to do list for SM

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the residence permit process

Decision from Migri

- **VM, UM and SM have to secure sufficient resources for Migri.** Migri must have adequate human resources to process the applications in 3 days, even during the busy and holiday seasons. If needed, the summer holidays of Migri should be moved to less busy season, as July and August are the most busy immigration seasons (e.g. seasonal workers and international students).

Printing and sending the residence permit card

- **VM, SM and Migri should secure sufficient resources for printing the cards.** The government should introduce more resources for the printing company for printing and sending the cards quicker.

3. Overcoming the bureaucratic obstacles in the registration process in Finland

National identity card from the police

- **Police, SM and Migri should secure a functional delivery of the identity card by**
 - o **Implementing an ask only once principle.** The information for the national identity card should be automatically transferred from the residence permit application
 - o **Allowing preordering the national identity card.** The person should be allowed to preorder the national identity card already when they submit the residence permit application
- **Police, SM and Migri should trust UM identification.** For persons from trusted countries, the identification done at the embassy should be enough.

4. Integrating in Finland

Finding a school for kids

- **TEM, SM and UM should not separate high school students from their families.** Currently, the residence permit process might force parents to leave their children behind if they are over 18 years old. The Finnish government should raise this age limit to 20 years to secure those children can live with their families until they have finalized secondary education.

Annex 10: A to do list for STM

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Overcoming the bureaucratic obstacles in the registration process in Finland

Health insurance card from KELA

- **VM and STM should secure sufficient resources for KELA.** KELA has to have adequate resources for processing the applications. KELA Card and European Health Insurance Card should not take six months to arrive.

Annex 11: A to do list for TEM

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Making Finland an attractive place to work

Finding a highly qualified person who is ready to move to Finland

- **Cities, TEM and UM should build a joint approach to international talent attraction on an ecosystem level instead of competing regional initiatives.** Instead of having several different competing initiatives and brands for talent attraction, the regions should focus on building joint ones for each national industry ecosystem (e.g. games industry).
- **Cities, TEM and UM should provide sufficient resources for marketing and branding.** Talent Finland has to have adequate resources for successful nation branding in co-operation with cities. The continuous global presence of Finland in international media and key industry events is crucial.
- **TEM should not forget exception management.** Business Finland should support companies in building up exception management strategies

Working remotely cross border

- **VM and TEM should provide clear guidance on working remotely from Finland or to Finland.** The guidance document should help companies allowing their employees to work over distance from third countries and the companies that want to enable their staff to work from Finland as remote workers. The government should pay particular attention to and minimize the potential risks emerging from creating accidentally permanent establishment for corporate taxation purposes and how to map the potential impact of Finnish social security benefits for the remote working employee.

3. Overcoming the bureaucratic obstacles in the residence permit process

A new employee agrees to move to Finland

- **TEM should introduce a visa for a job interview.** To speed up the process of getting a Schengen Visa for job interviews, a normal tourist visa should be enough to enter the country. Alternatively, the Finnish government should introduce a specific type of new visa (so-called D Visa) for job interviews and working temporarily in Finland that could later be transformed to a specialist residence permit.

The embassy checks the card and sends it to the employee

- **UM and TEM should introduce a welcome to Finland box.** In addition to official immigration documents, everyone moving to Finland should receive an official Welcome Box welcoming them to the country and informing the applicant about the next steps of the immigration process, including a reminder of their responsibility to notify Migri of all status changes immediately.
- **UM, TEM and Migri have to secure functional delivery:**
 - o 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 must inform all applicants about this possibility clearly.
 - o The embassy must have access to a system that automatically sends a notification to the employee waiting for the residence permit card to arrive, when the card arrives at the embassy and when they can come to collect it, or it has been sent forward from the embassy to the employee.
 - o In the long run, *Ulkomaalaislaki* must be amended so that residence permit cards can be sent directly to the employee from the manufacturer in countries where the post system allows this.

4. Integrating in Finland

Finding a job for a spouse

- **Migri, UM and TEM should secure that the residence permit process does not separate families.** Migri, UM and TEM should minimize the evidence requirements for proving that two persons have lived together.
- **Cities, VM and TEM should not build one size fits all solution for integration education.** Integration education must be a flexible framework, where public and private services providers (integration education provided by employers such as Finnish language classes) complement each other.
- **Cities (and TEM) must provide better, more accessible, and targeted employment services**

- Cities should build well-resourced Talent Finland Hubs in all key game dev hubs in Finland
- A too strict focus on vocational training among immigrants quickly leads to a failure to explore the full potential of immigrants with academic backgrounds. The academically educated foreign workforce in the Finnish job market, initially arriving in Finland as spouses of a person employed in Finland, should be a special focus area of public services
- Cities should have at least one service point where specifically trained personnel for highly educated foreigners are available
- Integration plans (kotoutumissuunnitelma) should be more thought over, longer, and have more detail.
- Waiting time from public employment service evaluation to actual integration plan steps, such as language course placement, should be cut from several months to a maximum of one month.
- Cities should explain the rules of the Finnish labour market to all clients.
- All public employment services should offer online services in English.
- Cities should provide dedicated support services for spouses locating in Finland. The International Talents Accelerating Growth project run by Helsinki is an excellent example of services needed: networking, mentoring, etc. Cities should provide support activities of this kind in other languages than English as well.

Finding a school for kids

- **TEM, SM and UM should not separate high school students from their families.** Currently, the residence permit process might force parents to leave their children behind if they are over 18 years old. The Finnish government should raise this age limit to 20 years to secure those children can live with their families until they have finalized secondary education.

Renewing a residence permit

- **Migri and TEM should not create a black market for residence permit appointments.** The best way to avoid the black market is to secure that there are always some free appointment times available, as it would secure that there is no need for appointment hoarding. When it is difficult to get appointments from Migri for renewing the residence permits, a black market for them will emerge. For more information (in Finnish) <https://yle.fi/uutiset/3-11525250>

Finding a new job from Finland after layoffs

- **TEM should introduce a new residence permit for highly skilled specialists looking for a new job in Finland.** To secure those talented employees stay in the country, laid off specialists should be allowed to apply for similar residence permits for looking for a job as recently graduated international students.

Annex 12: A to do list for UM

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Making Finland an attractive place to work

Finding a highly qualified person who is ready to move to Finland

- **Cities, TEM and UM should build a joint approach to international talent attraction on an ecosystem level instead of competing regional initiatives.** Instead of having several different competing initiatives and brands for talent attraction, the regions should focus on building joint ones for each national industry ecosystem (e.g. games industry).
- **Cities, TEM and UM should provide sufficient resources for marketing and branding.** Talent Finland has to have adequate resources for successful nation branding in co-operation with cities. The continuous global presence of Finland in international media and key industry events is crucial.
- **Cities and UM need to provide Marketing material.** Game developer studios need 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.
- **UM and Migri have to introduce a toolbox for international recruitment.** Toolbox helping Finnish companies to tackle the immigration process.

3. Overcoming the bureaucratic obstacles in the residence permit process

A new employee agrees to move to Finland

- **VM and UM should work to build a global eSignature system.** The embassy should always accept electronic signatures from trusted countries. In the long run, a global system for electronic signatures is needed.

Registration at enter Finland portal

- **UM should introduce a call-back service.** If problems should occur, the embassy should call the employer for clarification

An appointment at an embassy

- **UM should level up its public procurement standards.** Finnish embassies have outsourced their administrative processes related to residence permit applications to external service providers. In practice, this has led to a situation where an appointment that would take 30 minutes at Migri in Finland takes up two and a half hours at outsourced service providers. Furthermore, the outsourced service providers have failed to collect necessary documents from applicants, lost ID photos, and their machines for collecting biometric data have been broken. The broken administrative process has led to multiple visits and unnecessary time away from school for children and work for a spouse. The goal of outsourcing should be to make the process more effective, not cut costs by making the process less reliable.
- **VM, Migri, and DVV should implement the ask only once principle.** All data should be automatically moved from the residence permit database to the Population information system, including information on children and a spouse. For this reason, Ulkomaalaisrekisterilaki has to be amended so 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.

UM should introduce a Universal Digital Finnish Embassy

- Universal Digital Embassy should be established so that the applicants wouldn't have to travel to a physical embassy.
- Video appointments should be made available when possible.

A confirmation from the embassy

- **VM and UM should secure sufficient human resources for embassies to process the applications.** The embassy must have enough human resources confirm the application within one day from the appointment
- **UM should make the system more accessible in local languages.** The electronic systems for handling the residence permit applications should be accessible in a local language or at least in English so that embassies can hire and train local staff for processing the applications
- **UM should level up its public procurement standards.** The use of outsourced services like VFS for processing the applications should not create an extra lag to the process. Currently, applicants might need to wait for two months to have an appointment form outsourced service provider.

Decision from Migri

- **VM, UM and TEM have to secure sufficient resources for Migri.** Migri must have adequate human resources to process the applications in 3 days, even during the busy and holiday seasons. If needed, the summer holidays of Migri should be moved to less busy season, as July and August are the most busy immigration seasons (e.g. seasonal workers and international students).-

The embassy checks the card and sends it to the employee

- **UM and TEM should introduce a welcome to Finland box.** In addition to official immigration documents, everyone moving to Finland should receive an official Welcome Box welcoming them to the country and informing the applicant about the next steps of the immigration process, including a reminder of their responsibility to notify Migri of all status changes immediately.
- **VM and UM should secure sufficient resources for embassies for delivering the cards smoothly.** The embassies must have enough human resources to process the residence permit cards in one day
- **UM, TEM and Migri have to secure functional delivery:**
 - o 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 must inform all applicants about this possibility clearly.
 - o The embassy must have access to a system that automatically sends a notification to the employee waiting for the residence permit card to arrive, when the card arrives at the embassy and when they can come to collect it, or it has been sent forward from the embassy to the employee.
 - o In the long run, *Ulkomaalaislaki* must be amended so that residence permit cards can be sent directly to the employee from the manufacturer in countries where the post system allows this.

4. Integrating in Finland

Finding a job for a spouse

- **Migri, UM and TEM should secure that the residence permit process does not separate families.** Migri, UM and TEM should minimize the evidence requirements for proving that two persons have lived together.

Finding a school for kids

- **TEM, SM and UM should not separate high school students from their families.** Currently, the residence permit process might force parents to leave their children behind if they are over 18 years old. The Finnish government should raise this age limit to 20 years to secure those children can live with their families until they have finalized secondary education.

Renewing a residence permit

- **Migri and UM should always provide correct and clear information.** Migri and UM should remove all misleading and unclear information from their websites. For example, it is unclear if employees are allowed to participate in international games industry events outside the Schengen area while their residence permit is under review.

Annex 13: A to do list for VM

1. In general

A single digital service to unite them all:

- **VM, TEM, UM, MIGRI, DVV, Police, VERO, KELA should introduce a single service to unite them all.** 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 be able to modify the application. The information submitted through the site should be stored on user accounts so that all information would be ready for reapplying for 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.

2. Making Finland an attractive place to work

Working remotely cross border

- **VM and TEM should provide clear guidance on working remotely from Finland or to Finland.** The guidance document should help companies allowing their employees to work over distance from third countries and the companies that want to enable their staff to work from Finland as remote workers. The government should pay particular attention to and minimize the potential risks emerging from creating accidentally permanent establishment for corporate taxation purposes and how to map the potential impact of Finnish social security benefits for the remote working employee.

3. Overcoming the bureaucratic obstacles in the residence permit process

A new employee agrees to move to Finland

- **VM and UM should work to build a global eSignature system.** The embassy should always accept electronic signatures from trusted countries. In the long run, a global system for electronic signatures is needed.

A confirmation from the embassy

- **VM and UM should secure sufficient human resources for embassies to process the applications.** The embassy must have enough human resources confirm the application within one day from the appointment

Decision from Migri

- **VM, UM and TEM have to secure sufficient resources for Migri.** Migri must have adequate human resources to process the applications in 3 days, even during the busy and holiday seasons. If needed, the summer holidays of Migri should be moved to less busy season, as July and August are the most busy immigration seasons (e.g. seasonal workers and international students).

Printing and sending the residence permit card

- **VM, SM and Migri should secure sufficient resources for printing the cards.** The government should introduce more resources for the printing company for printing and sending the cards quicker.

The embassy checks the card and sends it to the employee

- **VM and UM should secure sufficient resources for embassies for delivering the cards smoothly.** The embassies must have enough human resources to process the residence permit cards in one day

4. Overcoming the bureaucratic obstacles in the registration process in Finland

Registration for a place of residence (kotikunta) at DDV

- **VM should update Kotikuntalaki 1993/201 4§. One year contract should be enough for registration.** Currently, a person must have a residence permit for at least one year but an employment contract for at least two years for the registration. As only a one-year residence permit is required, also only one year contract should be enough.
- **VM should secure sufficient resources DVV:** DVV should have adequate human resources to process an application in one day.
- **VM, Migri, and DVV should implement the ask only once principle.** All data should be automatically moved from the residence permit database to the Population information system, including information on children and a spouse. For this reason, Ulkomaalaisrekisterilaki has to be amended so 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.

Access to a bank account and a strong identification system from a bank

- **VM and FIN-FSA should secure access to basic banking services in a reasonable time.** If nothing else works, the new government has to propose a maximum three day processing time for accessing banking and identification services.
- **VM and FIN-FSA update their guidance on identifying the bank customers.** Banks should not require a national identity card for granting access to a strong online identification system. A passport and approved residence permit (printing and mailing the actual residence permit takes time) should be enough.

Health insurance card from KELA

- **VM, KELA and Migri should streamline the KELA card application process.** The employee should be allowed to apply for health insurance while filling the residence permit application.
- **VM and KELA should commit to an ask only once principle.** 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.
- **VM and STM should secure sufficient resources for KELA.** KELA has to have adequate resources for processing the applications. KELA Card and European Health Insurance Card should not take six months to arrive.

Registering to the tax authority for a tax card

- **VM, VERO and Migri should streamline the tax card application process.** One should be able to apply for a tax card already while applying for the residence permit
- **VM and VERO should commit to an ask only once principle.** All information submitted in the residence permit application should be automatically uploaded to a tax card.

5. Integrating in Finland

Starting a new life in Finland

- **VM should abandon immigration tax.** Vero should not consider immigration costs paid by the employer taxable personal income at all. 50% reduction is not enough for families immigrating from overseas. All immigration-related expenses paid by the employee should be deductible from personal income tax (also Finnish ID card).
- **VM should introduce a tax exemption for language courses paid by employers.** Vero should consider language courses paid by an employer for their employees or their family members as taxable income in personal taxation.

Finding a job for a spouse

- **Cities, VM and TEM should not build one size fits all solution for integration education.** Integration education must be a flexible framework, where public and private services providers (integration education provided by employers such as Finnish language classes) complement each other.
- **VM should not consider language courses paid by an employer for spouses as a taxable income for an employee.** Suppose companies want to provide part of mandatory integration education for their employees and their spouses and other family members. In that case, they should be allowed to do so without the cost being calculated as taxable income for the employee, and it should be a deductible cost to the employer.

Renewing a residence permit

- **VM should secure sufficient resources for decision making in Migri and DVV:** the government needs to immediately allocate adequate resources for quick and reliable decision-making in Migri (renewing residence permits) and DVV (registering EU citizens).
- **VM should not allow banks to kick out immigrants waiting for Migri to renew their residence permits.** Some banks require a valid residence permit for accessing their banking services. As it takes a long time for Migri to renew residence permits, banks have asked some Finnish game developer studio employees with expired residence permits to remove their money from a bank before the bank closes their bank account.

Annex 14: A to do list for EU

1. Overcoming the bureaucratic obstacles in the residence permit process

An appointment at an embassy

- **EU needs to introduce a European standard for identifying a person, and UM should seek synergies through co-operation with other EU/Nordic countries.** In the long run, UM should secure that the identification can occur in an embassy closest to the applicant in co-operation with other EU/Nordic embassies.