

SUMMARY

Annual Report for 2025  
of the Chancellor of Justice  
of the Government  
of Finland



CHANCELLOR OF JUSTICE

## SUMMARY

# Annual Report for 2025 of the Chancellor of Justice of the Government of Finland

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## To Parliament and to the Government

Pursuant to section 108(3) of the Constitution, I hereby submit this Annual Report to Parliament and to the Government on the official actions and observations on compliance with the law of the Chancellor of Justice in respect of the year 2025.

In legality oversight by the Chancellor of Justice, increasing attention was given to structural overseeing of legality. There were clearly more own initiatives filed, and more were resolved, than in previous years. A key part of structural oversight is overseeing the legality of bill drafting, particularly with a view to compliance with the Constitution and international human rights obligations, the exercising of participation rights, the consistency of legislation and the appropriate consideration of EU law. The number of cases in overseeing the legality of bill drafting increased, as more statement matters were resolved and more ex ante reviews of draft government proposals were conducted than in the previous year. The number of complaints taken up for closer scrutiny in legality oversight also increased from the previous year.

Because of the growing number of cases, the workload situation at the Office of the Chancellor of Justice as at the end of 2025 was somewhat less favourable than in the previous year. Fewer complaints were resolved than were filed. The processing times for complaints have also somewhat increased. At the end of the year, there was a clearly higher number of legality oversight cases pending than there had been in the previous few years.

One of the key events of the year under review was the new Chancellor of Justice taking office. Tuomas Pöysti LL.D. was Chancellor of Justice from 1 January to 30 April 2025. Professor Janne Salminen LL.D. took up the office of Chancellor of Justice on 1 September 2025. Mikko Puumalainen LL.D., LL.M. trained on the bench, was the Deputy Chancellor of Justice. Referendary Counsellor Petri Martikainen LL.L., LL.M. trained on the bench, Head of the Department for Legal Supervision, was the appointed Substitute for the Deputy Chancellor of Justice and attended to these duties for 236 days in 2025.

Helsinki, 13 March 2026

**Mr Janne Salminen**, Chancellor of Justice

**Ms Tuula Majuri**, Secretary General

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# 1 Statements





## ■ Mr Janne Salminen, Chancellor of Justice

# Focusing on the quality of legislation and the judicial framework of bill drafting

## Framework for high-quality bill drafting

Under the rule of law, legislation determines the foundation, goals and boundaries of the exercise of public power, and of course also of relationships between private parties. The legality of the exercise of public power and the actions of officials relies on the rule of law. The rule of law as enshrined in section 2(3) of the Constitution of Finland describes this duality as follows: “The exercise of public powers shall be based on an Act. In all public activity, the law shall be strictly observed.” This provision encapsulates the principles of legality and of adherence to laws. Any exercise of public power must therefore be based on an Act enacted by Parliament. The provision incorporates the requirement that the exercise of power must derive from a mandate from the people.

**Directing preparation of legislation is one of the most important task areas of the Government vis-à-vis parliamentarism.**

Legislation occupies a prominent role in our society in other ways too. This further underscores the importance of the preparation of legislation. In Finland, the enactment of Acts of Parliament is a form of parliamentary decision-making. In broad terms, this process begins with bill drafting, which is mainly done within the Government. Directing preparation of legislation is one of the most important task areas of the Government vis-à-vis parliamentarism.



The relevant ministries play a crucial role in the legislative drafting process (PeVL 19/2016 vp and more recently e.g. PeVM 6/2025 vp). If any shortcomings or actual errors survive the initial stages of the process, it is difficult to rectify them later. It is a guiding principle that if the process is of a high quality, then the legislation produced will also be of a high quality.

There is very little legislation governing the legislative process itself. Historically, there has been reluctance to legislate on how to legislate. This is a characteristic not unique to Finland. There is a desire for the regulation of the preparation of legislation to be based on flexible norms, due to the political dimension of the process and the diversity of bills.

It is indisputable and a fundamental part of democracy that legislation is primarily a political undertaking. This, however, must not be allowed to obscure the fact that it also includes judicial elements that sometimes acquire a dominant role. Bill drafting is no exception. Of course, once legislation has been enacted, not only the Acts but also their travaux préparatoires constitute the jurisprudence on the basis of which courts and authorities make their decisions.

In certain recent academic studies, I have sought to highlight the judicial framework that ensures the high quality of bill drafting and hence of the resulting legislation (see e.g. Hanna Hämäläinen & Janne Salminen, 'Lainvalmistelun oikeudelliset puitteet', *Lakimies* 2/2024 pp. 194–222 and Hanna Hämäläinen & Janne Salminen, 'Inclusive participation in law-making: good governance or a constitutional obligation?', *The Theory and Practice of Legislation* vol. 13, 2025, pp. 213–235). The aim here was to focus specifically on the judicial framework of the preparation of legislation and also the constitutional obligations incumbent on it. The aforementioned studies addressed the need to identify peremptory grounds for the content of a variety of instruments of a governing nature.

Although the steering of bill drafting is mainly rooted in a variety of decisions-in-principle, guidelines, recommendations and manuals, the regulation is not only of a flexible and advisory kind. Indeed, the purpose of the various regulatory devices referred to above is to incorporate important principles of constitutional law, ultimately deriving from the Constitution itself. Similarly, there is a relatively



large body of jurisprudence on bill drafting and its quality generated by the Constitutional Law Committee of Parliament and by the supreme overseers of legality.

## Law-making procedures in the new Rule of Law Checklist of the Venice Commission

The Venice Commission of the Council of Europe, formally the European Commission for Democracy through Law, recently revised its Rule of Law Checklist (16 December 2025, CDL-AD(2025)002) and in my view paid closer attention to the processes where legislation is created. There are several points on the Checklist that have to do with law-making procedures.

The Venice Commission also presents this dimension as interrelations between the rule of law on the one hand and democracy on the other. The processes promote responsibility and safeguard public interests while protecting the rights of all individuals. Inevitably, they also restrict the power of the majority. Concerns about the “winner takes all” approach are addressed more emphatically than before in the Checklist. The Commission emphasises things such as elements in the balance of power and the importance of the supreme oversight of legality in general. These are also applicable to the preparation of legislation.

The Commission likewise observes that the quality of legislation depends largely on the quality of the legislative process. Efficiency, transparency, inclusion and of course democracy are process requirements. The Commission notes that the travaux préparatoires must be easily accessible and should, as necessary, be augmented with thorough justifications and impact assessments. Compliance with ordinary legislative procedures is the baseline. The Commission notes that legislative procedures should recognise the role of the opposition and enable targeted, transparent hearings for those stakeholders that the bill concerns and for the civil society, think tanks and the general public whenever appropriate.



The Commission stresses that public debate, which facilitates participating in the management of public affairs and influencing their outcome, is an essential component of a democratic society. Bills should be publicly available well in advance of being presented to legislators, or at the very latest when they are so presented, to allow for public debate and feedback.

## **Recent statement by the Constitutional Law Committee on the quality of bill drafting**

Opinions issued by the Constitutional Law Committee on the constitutionality of legislation contain a wealth of remarks on the quality of bill drafting.

It is particularly important in this context to point to a recent opinion voiced by the Constitutional Law Committee in report PeVM 6/2025 vp in response to the government proposal for an Act amending the Government Act (HE 137/2025 vp). This opinion addressed the fact that the government proposal suggested that the status of the Legislation Evaluation Council be provided for in legislation pertaining to the Government.

In its report, the Committee points out that it has on several occasions commented on the need to assess the impacts of proposed legislation. As the Committee notes, this issue has emerged during multiple parliamentary terms (see e.g. PeVL 16/2023 vp, PeVL 44/2014 vp). It is thus by no means a new issue. The Committee further notes that it has emerged in its work that there have been legislative projects with significant and broad societal impact among the inadequately prepared legislative proposals. Sometimes even major projects have been submitted to Parliament without proper impact assessments or justifications of enactment procedure (PeVM 3/2016 vp and PeVL 16/2016 vp). The Committee notes that impact assessment in the process of legislation preparation yields information about the effects of the various options for execution. The goal here is for decision-makers to have access to reliable information about the alternative solutions and their consequences. The Committee notes, referring to one of its earlier reports (PeVM 3/2016 vp), that a high-quality impact assessment improves the quality of legislation.



Thus, the Committee links the issue of impact assessments to the more general issue of the quality of legislation. At the same time, however, it takes a negative stance on increasing the regulation of bill drafting. The Committee specifically points to trends that would lead to excessive legislative regulation of bill drafting, considering these a risk, and goes on to note that in a democratic system it is “essential that the role of bills as a vehicle for implementing the political aims of the Government, which enjoys the confidence of Parliament, remain a central element in the preparation of legislation”. Underlying this are deliberations that, somewhat dubiously in view of the above, proposed restricting the Government’s means for submitting bills to Parliament.

In the context of the debate on what things in general are essential in the legislative process, the Constitutional Law Committee emphasises that improvements to the quality of bill drafting should primarily focus on the statute itself first and the rationale for the statute second. From the Committee’s perspective, it is clear that the assessment of the constitutionality of any bill must be placed centre stage; the constitutionality of legislation, its consistency with the judicial system, its clarity and its comprehensibility must be ensured at the preparation stage. As the Committee notes, it regularly comes across cases where it has to remark on unclear content and insufficient enactment procedure rationale in bills.

The recent remarks of the Constitutional Law Committee are a direct continuation of this trend, as noted above. Recently, issues such as the combined effect of suggested changes to the standard of fundamental rights and other forthcoming reforms have resurfaced in public debate. The Committee has noted that implementing reforms in one particular cluster of issues through multiple separate government proposals may mean that the Committee is obliged to assess any individual bill on the basis of incomplete information and is unable to consider the cumulative effects of the various proposals. The Committee has further noted that simultaneous reforms to be implemented to a single legislative entity should be compiled into a single government proposal if possible, or at least the impacts of multiple reforms addressing the same fundamental rights should be assessed as comprehensively as possible.



My observations indicate that the Constitutional Law Committee constitutionally links factors such as the assessment of combined impacts but also more generally the quality of government proposals not only to the status of Parliament as a legislative body but also to the parliamentary right to receive information referred to in section 47 of the Constitution of Finland. In another recent report, on the report of the Chancellor of Justice for the year 2024 (PeVM 2/2026 vp), the Constitutional Law Committee specifically pointed out the need to focus on the proposed provision itself and its rationale in bill drafting, along with the enactment procedure rationale.

## Opinions by the Chancellor of Justice on bill drafting

As part of his duties to oversee the legality of the official actions of the Government, the Chancellor of Justice oversees the quality of legislation for instance from the perspective of fundamental rights and can also intervene in issues of compliance with the various guidelines governing bill drafting. In bill drafting, the Chancellor of Justice conducts both ex ante and ex post legality oversight.

**In bill drafting, the Chancellor of Justice conducts both ex ante and ex post legality oversight.**

Oversight is applied to the decision-making of Government before Acts are enacted. Legality oversight also extends to the decision-making of Government and of the President of the Republic when confirming Acts. The purpose of legality oversight by the Chancellor of Justice in respect of government proposals is to evaluate whether the proposal is judicially appropriately prepared for submitting to Parliament, in view of its form and content, and whether fundamental and human rights in particular were sufficiently considered in the preparation process. This is affected through means of ex ante statute control: statements on draft government proposals, advance review of bills and oversight at and before Government sessions.

Naturally, bill drafting also falls within the scope of ex post legality oversight with regard to procedures. This involves legality oversight through complaints and own initiatives, and also legality oversight visits. The overseers of legality thus have



opportunities for examining the quality of bill drafting even after the legislation has been enacted. The ex post legality oversight of bill drafting by the Chancellor of Justice provides opportunities for addressing structural problems in bill drafting and impact assessments along with the appropriate discharging of and responsibility for the duties of the relevant ministry. Essentially, all legality oversight involves similar stages and methods.

Indeed, the supreme overseers of legality have issued a fairly high number of opinions having to do with bill drafting. These opinions are quite closely aligned for instance with the views of the Venice Commission.

On the one hand, the opinions have to do with the organisation of bill drafting, specifically concerning the relationship with Parliament, and on the other hand they have to do with actual quality issues in bill drafting. The organisation-related opinions largely have to do with problem issues in the outsourcing of bill drafting and with the relationship between the powers of Government and Parliament. Organisation also includes things like tight timetables: opinions have addressed cases where Government is pressing towards implementation even though Parliament has not finished working through the matter.

Opinions concerning the quality of bill drafting focus particularly on the various dimensions of the hearing procedure, i.e. features such as the time reserved for hearings, information available to parties returning statements, language versions and also compliance with actual statutory requirements for hearings. Cases where the preparation is of a poor quality or incomplete in terms of its content are a category unto themselves. On occasion, coordination problems between legislative projects have been observed within the Government that have required intervention.

Typically, opinions addressing various statements and decisions are justified with the guidelines for bill drafting, but more importantly with the constitutional provisions concerning the division of governmental duties, democratic decision-making and good governance.



## Outlook

Above, I have approached the topic at hand on the basis of my previous research and in the context of the duties of the Chancellor of Justice from a decidedly judicial perspective and relying on established practice in supreme legality oversight.

One of the issues in improving the quality of bill drafting has to do with the problem of how to measure quality. Measuring is a means for assessing the current state of the quality of bill drafting and quality trends over a specific time period. We should note that while measuring quality is not an unambiguous process, it is also not impossible. Quality can be considered from a variety of perspectives. There are already useful indicators in place for the quality of bill drafting, such as knowledge base, inclusion, smoothness of the process and impact assessments.

The duties of the Chancellor of Justice do not include being involved in bill drafting within the ministries, which is where the actual drafting is done. Ministries must make it their business to ensure that they have sufficient personnel who are professionally competent and who are capable of identifying and familiar with issues of constitutional law. Constitutional law issues cannot be simply passed forward to be addressed in Parliament. On the other hand, however, unnecessary deliberations of constitutional law should be avoided.

In its recent report referred to above, the Constitutional Law Committee of Parliament calls for attention to be paid to the basics in bill drafting. The Committee notes that in bill drafting, the proposed statute itself and its rationale must be placed centre stage: its constitutionality, its consistency with the judicial system, its clarity and its comprehensibility. These are the basics. My personal experience as an expert at committee hearings in Parliament supports the position of the Constitutional Law Committee.

Although some legislative projects have been highly successful, unfortunately at times in legality oversight one comes across legislative projects that are so poorly prepared that there are problems with all the basics. With these, the Chancellor of Justice is caught in a difficult dilemma in having to draw the line between legality oversight and bill drafting.



**It would be beneficial for ministries to develop internal quality control functions as well.**

It would be beneficial for ministries to develop internal quality control functions as well. The number of observations made by the Chancellor of Justice during the so called review of the presentation agenda – and the slight increase in this number – betray the need for such functions. Also, efforts should be made going forward to improve bill drafting and e.g. revision in Government.

There is already a surfeit of guidelines pertaining to bill drafting. Moreover, increasing legislative regulation in this respect is viewed critically, and with good reason. Amidst this wealth of guidelines, it might be a good idea to prepare a summary of the relevant code of conduct, beginning perhaps with consolidating existing guidelines on the basis for instance of the decision-making practice of the Constitutional Law Committee of Parliament and summaries of opinions of the supreme overseers of legality. Bill drafting and how it is to be improved must be based on a commitment to guidelines.



■ Mr Mikko Puumalainen, Deputy Chancellor of Justice

## Violence against women and intimate partner violence: why is achieving positive change so slow?

Official actions to address violence against women and intimate partner violence have been a focus area in my legality oversight activities since 2018. This is a type of behaviour that causes a shocking amount of human pain and suffering in Finland and worldwide.

The Istanbul Convention<sup>1</sup> specifies a number of measures devised to address this issue. Enforcement of the Convention is overseen by an independent expert body known as GreVio.<sup>2</sup> I met the group on their first visit to Finland in 2018. This meeting was an important wake-up call. I understood then that taking the Convention on board requires Finland to devise new approaches and effectively implement them in order to improve the current situation.

In November 2018, I made an on-site legality oversight visit to the legality oversight function of the National Police Board. The Annual Report of the Chancellor of Justice for that year notes<sup>3</sup> that “... Particular issues presented to the Deputy Chancellor of Justice included ... police measures related to the ‘Istanbul Convention’ on preventing and combating violence against women and domestic violence and

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1 Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (SopS 53/2015).

2 Group of Experts on Action against Violence against Women and Domestic Violence.

3 See the Annual Report for 2018 of the Chancellor of Justice of the Government of Finland, K 2/2019 vp, p. 162.



its implementation.” I had requested a presentation on this issue before my visit, and I recall that during the visit I asked how implementation of the Convention will change field operations of the police in particular. I recall I was not entirely satisfied with the answer I received, and indeed I have had cause to revisit this issue in several subsequent decisions.

## Several authorities are important – police action is often crucial

My legality oversight having to do with violence against women and intimate partner violence has focused particularly on police action. However, it is important to note that multiple other authorities have both the means and the responsibility to identify and act against such violence, including the social welfare and health care sector, early childhood education and education authorities.

**Intervention in an act of violence demonstrates to the perpetrator that their actions are not acceptable.**

Having said that, my decision concerning the obligation to file a report of an offence for instances of assault in an intimate relationship, issued in 2019,<sup>4</sup> demonstrated just how important the role of the police is in addressing intimate partner violence – regardless of whether the violence in any particular case is a one-off occurrence, repetitive or escalating. Intervention in an act of violence demonstrates to the perpetrator that their actions are not acceptable.

Motivating the victim to seek out support services, making a comprehensive assessment of the victim’s situation and need for protection, and effectively pursuing action to establish criminal liability may help the police to defuse a violent situation and also prevent it from escalating. This is even more effective the sooner a violent incident can be addressed after it occurs.

<sup>4</sup> A report of an offence must be filed for assault in an intimate relationship OKV/1325/1/2018.



In my decision concerning violence risk assessment and victim protection, issued in the year under review, it once again became apparent what a vital role the police play – or should play – in protecting victims.<sup>5</sup> In many cases, the police have the best information and the best opportunity to conduct a risk assessment. Moreover, several measures of crucial importance for victim protection, such as coercive measures or restraining orders, basically require police action.

Also, no individual authority has an isolated responsibility; all must work together to coordinate various measures to address any particular case. It goes without saying that such collaboration is part of all ordinary high-quality operations of public authorities and good governance, but it is of particular importance in the combating of intimate partner violence. Sometimes victims of violence need long-term support, patience and guidance through the chain of services.

The third sector and other operators such as Victim Support Finland, along with wider collaborative structures such as Multi-Agency Risk Assessment Conferences (MARAC) support and complement the actions of the authorities in a significant way. I have evaluated the MARAC model in two of my decisions and recommended that guidelines and regulation concerning that model be further specified.<sup>6</sup>

The risk with such collaborative structures, however, is that they are not considered core functions of the authorities and may thus be sidelined through resource prioritisation. In the case of the so called third sector, this threat is even more palpable. NGOs provide a significant volume of services for both violence prevention and special needs. NGOs are all but alone in providing certain kinds of services, such as work with perpetrators and services after discharge from a shelter, and expertise in these is not readily available in public-sector services. Public authorities cannot cope with combating intimate partner violence on their own.<sup>7</sup>

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5 Violence risk assessment and victim protection OKV/1905/10/2022.

6 The procedure of police department in intimate partner violence risk assessments OKV/488/70/2025; Call to evaluate the need for regulation and guidance for the MARAC method OKV/175/1/2017.

7 On-site legality oversight visit by the Deputy Chancellor of Justice to the Finnish Institute for Health and Welfare OKV/162/71/2025.



## Competence gaps in basic matters

As several of my decisions illustrate, intimate partner violence is an issue that is complex and sometimes even comes as a surprise in operations of the authorities. It may involve factors that in themselves explain the difficulty in achieving lasting results. Some of these factors are issues that emerge in respect of the operations of the authorities in other legality oversight topics as well: individual errors and broader structural problems such as a shortage of resources or expertise. What was particularly unexpected was discovering gaps in police competence, sometimes in very basic areas of police work. The clearest examples of this are negligence in recording requests for investigation concerning intimate partner violence and the related arrangement of prosecution rights.<sup>8</sup> After all, minor assault in an intimate relationship was converted from a complainant offence to an indictable offence in 2011.

This matter emerged more generally as, in the year under review, at my own initiative I examined criminal investigations that in the police information system had been classified as intimate partner violence and, it seems from entries in the system, were closed because there was no demand for punishment from the injured party.<sup>9</sup> The examination of this matter was initiated in January in the year under review, at which time I attended and spoke at a webinar hosted by the Non-Discrimination Ombudsman.<sup>10</sup> At this seminar, statistics on criminal investigations concerning intimate partner violence were presented.<sup>11</sup> According to these, even after the law changed in 2011, the police have repeatedly closed cases of intimate partner violence because there was no demand for punishment

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8 This emerged e.g. in the following decisions: A report of an offence must be filed for assault in an intimate relationship OKV/1325/1/2018; Filing a report of an offence for assault in an intimate relationship OKV/2205/10/2024.

9 Police performance in criminal investigations into intimate partner violence OKV/934/70/2025.

10 Remarks by Deputy Chancellor of Justice Mikko Puumalainen at a webinar of the Non-Discrimination Ombudsman on 14 January 2025, 'Violence against women in the criminal investigation process': "The violence risk assessment requirement and victim protection must be strengthened in the combating of violence against women and intimate partner violence." These remarks were posted on the oikeuskansleri.fi website.

11 Progress in the criminal investigation process of cases of violent offences against women. Ministry of Justice publications. Reports and guidelines 2025:1.



from the injured party. Because this was not supposed even to be possible, I decided to examine the matter at my own initiative.<sup>12</sup>

My decision included a sampling of criminal investigations that had been classified as intimate partner violence and closed because of the absence of a demand for punishment by the injured party, in a six-month period (1 October 2024 to 31 March 2025). Most of these decisions to close the criminal investigation were unlawful, and they were to be found in almost all police departments. I considered this to be a widespread and persistent problem. After my request for explanation, police departments reopened 40 criminal investigations.

Compliance with the obligations in the Criminal Investigation Act to evaluate the need of an injured party for special protection and to inform an injured party of their rights has also proved to be inadequately implemented.<sup>13</sup> Since no entries were made on measures taken, it is very difficult to evaluate cases after the fact. Were no measures taken at all, or were they simply not recorded? It is downright ironic that entries were also neglected in the year under review in a criminal investigation conducted by a special prosecutor specifically to address police negligence as an offence in office in taking those measures and recording them.<sup>14</sup>

In a decision issued by me in March in the year under review, I requested the National Police Board to find out how police departments had implemented oversight of the recording of measures taken in criminal investigations in respect of the rights of injured parties, as specified in the National Police Board's report on legality oversight for 2023. After this, the National Police Board noted that they had begun a legality oversight investigation at their own initiative.<sup>15</sup>

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<sup>12</sup> Police performance in criminal investigations into intimate partner violence OKV/934/70/2025.

<sup>13</sup> Violence risk assessment and victim protection OKV/1905/10/2022.

<sup>14</sup> Duration of a criminal investigation, protocol entries and final statement OKV/490/70/2025.

<sup>15</sup> The investigation of the National Police Board is still pending at the time of writing (28 October 2025).



## Risk assessment and victim protection

Not knowing about and not understanding the particular features of violence against women in particular and intimate partner violence in general is an equally serious issue.<sup>16</sup> This point was made tragically in the year under review in a decision concerning violence risk assessment and victim protection (OKV/1905/10/2022). In the matter at hand, an ex-boyfriend murdered a woman after a year of stalking her. The woman had filed several reports of an offence with the police.

The police department had this to say in their statement returned to the complaint:

“... the police department notes that ex post evaluation of a matter such as the matter at hand often leads to a different emphasis, as further information has later been gained. In the ex post evaluation of a matter such as this it is often possible to find indications of circumstances which are not inconsistent with subsequent events but on the basis of which it could not have been possible to anticipate said subsequent events.

... it is the considered opinion of the police department that neither of the ... criminal matters under criminal investigation at the police department cannot be seen to involve circumstances that, given what was known at the time, would have resulted in probable cause to suspect that the suspect would commit a serious offence against the health and life of the injured party.

On the basis of the criminal investigation material, the actions of the suspect in respect of the injured party, taken as a whole, came across to the police rather as extensive and prolonged harassment.”<sup>17</sup>

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<sup>16</sup> This was extensively discussed in the decision Violence risk assessment and victim protection OKV/1905/10/2022.

<sup>17</sup> Violence risk assessment and victim protection OKV/1905/10/2022, p. 35.



I was unable to concur with this view. After recounting the numerous incidents that led up to the homicide,<sup>18</sup> I observed:

“The police (thus) had knowledge of multiple background factors which, in the light of research findings, can anticipate an escalation of violence. However, this information, these incidents and these risk factors were never assessed as a whole. Police officers based their impressions on individual incidents investigated and addressed the woman’s situation mainly as that of a victim of stalking or harassment.

At no point was there a systematic assessment of the risk of violence against the woman, nor was the seriousness of that risk considered, or any plan devised to manage such security risk. Yet even stalking is a process where individual incidents form a continuum. Apart from everything else, the man had sent the woman more than 2,000 messages.”

Some of the structural factors involved in intimate partner violence and victim protection are somewhat more covert but nevertheless identifiable through means of legality oversight. These include shortcomings in legislation and guidelines for the authorities. Such shortcomings may have far-reaching consequences.

I say that because what became apparent in this homicide case was that our Criminal Investigation Act as it now stands is quite callous from the victim’s point of view. It seems designed for streamlining the criminal investigation process rather than safeguarding the victim, because the protective measures provided for in the Act apply to the criminal investigation process and not to comprehensive protection of the victim. Under chapter 11 section 9a of the Criminal Investigation Act, a criminal investigation authority “shall, without undue delay, assess if special measures are needed to protect the injured party when the matter is handled in the criminal investigation and at the trial.” (my emphasis)

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<sup>18</sup> Violence risk assessment and victim protection OKV/1905/10/2022, p. 36.



By contrast, Article 51 of the Istanbul Convention, addressing risk assessment and risk management, reads as follows:

“1. Parties shall take the necessary legislative or other measures to ensure that an assessment of the lethality risk, the seriousness of the situation and the risk of repeated violence is carried out by all relevant authorities in order to manage the risk and if necessary to provide co-ordinated safety and support.” (my emphasis)

There is thus an obvious discrepancy between the provisions of the Criminal Investigation Act and those of the Convention. The police have a duty to take steps to protect the victim even beyond the criminal investigation and trial.

## Restraining orders

One of the systems designed for the police to intervene directly is the restraining order, specifically meaning that the police have a duty to issue one temporarily and at their own initiative. The Act on Restraining Orders was amended with an Act that entered into force on 1 October 2023 (202/2023). Pursuant to this amendment, for an official with the power to arrest to impose a restraining order at their own initiative it is no longer required that the person protected is unable to apply for the restraining order themselves.

With this change to the Act on Restraining Orders, a court may now issue a restraining order enforced by technical surveillance. The police play a key role in issuing these as well, because a restraining order enforced by technical surveillance cannot be applied for by the person protected themselves; a court can issue one only at the request of an official with the power to arrest.

In my decision (OKV/1905/10/2022), I requested the National Police Board to submit a report on how the amended Act on Restraining Orders had been applied by the police and how police personnel had been instructed and trained in respect of the changes. Up until that time, the measures taken had focused on training.



I noted in another decision (OKV/965/70/2023) that it would be essential for the operations of the police and for the equality of citizens to monitor whether there are significant differences in practice between police departments and how many temporary restriction orders the police have issued at their own initiative and how many applications for restraining orders enforced by technical surveillance they have submitted after the amendment entered into force. It is further essential to establish in the legality oversight of intimate partner violence and sexual offences what the authorities have done, and also what they have not done. In issuing restraining orders, for instance, the most useful cases vis-à-vis legality oversight and improving police operations may be found in cases where these measures were not taken even though the prerequisites for them existed.

## Change is possible

I noted in the decision (OKV/1905/10/2022) that

“preparations must swiftly be made for the necessity of legislative amendments concerning risk assessment and risk management, so that our statutes, competence and official practices can finally be brought in line with the international obligations to which Finland is committed, and victims of crime could be more effectively protected against violence.”

The European Union has adopted a *Directive on combating violence against women and domestic violence*, which contains detailed provisions inter alia on individual assessments of a victim’s needs for protection. Member States are required to implement this Directive by June 2027.<sup>19</sup>

Implementation of this Directive will allow us to implement stronger protective measures for victims of intimate partner violence.

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<sup>19</sup> Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence.



Combating intimate partner violence is not just about legislation. Part of the problem stems from biases in the operating culture and attitudes of the authorities. These occasionally emerge in legality oversight through reports submitted by officials. My legality oversight decisions show that frustration and cynicism must not obscure the fact that the police do have means to protect victims and that using these means should be part of the basic toolkit of the police.

**Combating intimate partner violence is not just about legislation. Part of the problem stems from biases in the operating culture and attitudes of the authorities.**

The combating of intimate partner violence is complicated by the difficult position of the victims. Victims do not file complaints: they are either dead, scared, trying to hold on to normality or quite simply do not see themselves as victims. However, the strength of the complaint procedure is that not only the victim but also their family members or other people in their safety networks can file a complaint, thereby putting the actions of officials under scrutiny in legality oversight.

As an example, we may take the case where a family member of a person who died as a result of intimate partner violence filed a complaint about the actions of the police (OKV/1905/10/2022). The decision in that case highlighted essential shortcomings in the legislation pertaining to intimate partner violence, including those discussed above. In 2018, a complaint filed by a local shelter resulted in the investigation of a case in legality oversight that very concretely exposed several shortcomings in police procedures vis-à-vis intimate partner violence. Another complaint, filed by the Federation of Mother and Child Homes and Shelters in 2024,<sup>20</sup> was also important but also demoralising, because it involved the same errors that were made in 2018, even though police guidelines had been revised and training increased pursuant to my decision issued in 2019.<sup>21</sup>

<sup>20</sup> Filing a report of an offence for assault in an intimate relationship OKV/2205/10/2024.

<sup>21</sup> A report of an offence must be filed for assault in an intimate relationship OKV/1325/1/2018.



## Never give up

Decisions in cases concerning intimate partner violence hinge in many ways on the quality of the criminal investigation and how promptly it proceeds. After all, these are general points of interest in legality oversight. Of course, the cases I have examined also involved issues that are commonplace in all police operations, such as how to manage and prioritise a large caseload, investigating officers being replaced and burnout. However, intimate partner violence cannot be approached as just another criminal investigation, nor can it be approached as an ordinary offence endangering life and limb. It has special features that are sometimes not recognised.

In this sense, there is a connection in terms of quality and promptness in investigations of intimate partner violence on the one hand and human trafficking and sexual offences on the other, which I have also examined – the latter including shortcomings in investigations of sexual offences against children and adolescents.<sup>22</sup> Identifying human trafficking has been a particular development need for police training.

What these categories of offences also have in common is that their victims are in the most vulnerable population groups. In 2024, human trafficking, intimate partner violence or sexual offences were no longer focus areas in the internal legality oversight of the police. However, as recently as in 2023 the internal inspection report of the police reported widespread issues in the quality of criminal investigations of sexual offences. In the year under review, several of my decisions in legality oversight that have led to concrete measures involved violence against women.

My decisions have shown that there is a persistent great need, both within the police and beyond, for legality oversight in the combating and investigation of offences against the most vulnerable people in society.

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<sup>22</sup> Police and prosecutor procedures and investigations of human trafficking OKV/1223/70/2021 and OKV/1956/90/2021; Police procedures in criminal investigations of intimate partner violence and sexual offences OKV/325/70/2022.



I wrote about combating violence against women and intimate partner violence in an article in the Annual Report for 2020 of the Chancellor of Justice.<sup>23</sup> Unfortunately, this topic remains relevant to this day. It has been much debated, and tragic stories of such cases can be read in the media almost on a weekly basis. News such as these feed the impression that no essential improvement is happening. However, this may be an issue of perspective: we read about cases where there was a failure to protect the victim, but we do not read about cases where violence was prevented.

Also, the police, many other officials, NGOs and private individuals are constantly striving to combat such violence. The supreme overseer of legality is also included in the above. As my decisions indicate, there are opportunities for enhancing legislation, updating police guidelines and adding to police training even more – and thereby effecting change for the better. The new police guideline on police actions in matters of intimate partner violence<sup>24</sup> is a promising sign of such a trend. However, we should finally get all these good guidelines put into practice in day-to-day police work.

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23 See the Annual Report for 2020 of the Chancellor of Justice of the Government of Finland, K 17/2021 vp, pp. 24–26, “The Chancellor of Justice and the upkeep and development of the rule of law”.

24 On 24 October 2025, the National Police Board issued a new guideline on police action in matters of intimate partner violence (POL-2025-39511), with everyone employed in the police as the target group. This guideline contains concrete instructions on how to identify and record intimate partner violence and on the support, protection, risk assessment and investigation measures required in the preliminary and actual investigations, how to record these and how to conclude the criminal investigation. A letter of referral to services and checklists for field patrols and for criminal investigators are appended to the guideline.



## 2 Overview of the year under review





## Key elements in legality oversight by the Chancellor of Justice

In 2025, the Chancellor of Justice continued to enhance oversight and its effectiveness and to shift the focus in operations increasingly towards structural oversight.

In the oversight of Government activities, the number of cases increased particularly in legislation oversight, as the number of requests for statements and ex ante reviews of proposed legislation grew while the legislative work of the Government progressed. The Chancellor of Justice also issued more opinions than in the previous year. The number of requests for rectification given in the so called review of presentation agenda remained at a high level (22% of all matters processed). A significant majority (80%) of the requests for rectification given by the Chancellor of Justice had to do with judicial corrections to presentation documents. NATO membership, the continued Russian war of aggression in Ukraine and the foreign and security policy situation were major issues in the oversight of Government activities by the Chancellor of Justice.

On 18 June 2025, Deputy Chancellor of Justice Mikko Puumalainen issued an opinion pursuant to section 2(2) of the Act on the Chancellor of Justice of the Government of Finland in the presentation of a proposal for approving an Act. This proposal concerned amending section 7 of the Act on Temporary Measures to Combat Instrumentalised Migration.<sup>25</sup>

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<sup>25</sup> The opinion of the Deputy Chancellor of Justice, as recorded in the Government minutes, was: “Parliament has adopted the government proposal for an Act Amending Section 7 of the Act on Temporary Measures to Combat Instrumentalised Migration (HE 18/2025 vp; EV 59/2025 vp) as a limited derogation to the Constitution pursuant to section 73 of the Constitution of Finland. The Act is in force unamended until the end of 2026.

The Constitutional Law Committee remarked when issuing a statement on the Act now being approved that its provisions are not consistent with Finland’s international human rights obligations and also referred to the relevant Articles in the EU Charter of Fundamental Rights and the founding agreements of the EU, and to EU legislation.

The Act being approved may be used to restrict the providing of international protection on a limited portion of Finland’s national border and in the immediate vicinity thereof. Non-refoulement is an absolute fundamental and human right that incorporates the right to seek international protection and a ban on inhuman treatment. These obligations are binding upon the Government in plenary session when making a decision on such restrictions and form part of the deliberations through which the risk of infringing upon absolute fundamental and human rights can be avoided.”



Complaints placed a higher workload on legality oversight in the year under review than in the previous year, as the number of complaints taken up for closer scrutiny in legality oversight continued to rise (2025: 1,658; 2024: 1,411; 2023: 1,268). The percentage of decisions involving sanctions out of all complaints requiring an investigation was 14% (2024: 13%). No charges were directed in the decisions involving sanctions, but 13 reprimands and 103 opinions were issued. The largest numbers of complaints were brought, as before, against the police, the general courts, the Government and local authorities. During the year under review, 335 complaints as referred to in section 3 of the Act on the Division of Duties Between the Chancellor of Justice of the Government and the Parliamentary Ombudsman (330/2022) were transferred to the Parliamentary Ombudsman (2024: 419).

An unusually high number of own initiatives was resolved in 2025 (55) due to the change of decision-makers. The number of own initiatives filed was 30 (2024: 43). These resolutions led to 7 reprimands, 33 opinions, 2 suggestions for improving court rules and one compensation proposal. There were 9 legality oversight visits in all.

The number of cases involving offences in office by judges continued to increase slightly year on year. Suspected offences in office by judges are reported to the Chancellor of Justice by Courts of Appeal, by prosecutors and by the police. Of the resolutions issued in cases involving alleged offences in office by judges in the year under review, 18 led to further action: charges were brought in one case and 15 reprimands, and 2 opinions were issued.

Under the Act on the Chancellor of Justice of the Government, the Chancellor reviews penal sentences imposed by district courts. Reviewing penal sentences is a special duty assigned to the Chancellor of Justice alone. In 2025, the number of penal sentences reviewed was just over 3,000; 93 cases were taken up for closer scrutiny. In the year under review, action was taken in 28 cases: charges were brought in one case and 12 reprimands, and 15 opinions were issued.



It is a special duty of the Chancellor of Justice to oversee the actions of attorneys-at-law, public legal aid attorneys and licensed legal counsels. The Chancellor of Justice oversees the oversight system and Disciplinary Board of the Finnish Bar Association and the Board on Trial Counsel to ensure that their operations are appropriately managed. The number of cases filed in the oversight of attorneys remained relatively high (2025: 734; 2024: 847); 662 cases were resolved (2024: 884).

The duty assigned to the Office of the Chancellor of Justice to maintain a centralised external whistleblower channel, as mandated in the ‘Whistleblower Act’ (1171/2022), generated less work than anticipated, as the number of reports submitted remained low. In May 2026, the Office of the Chancellor of Justice will submit to the European Commission the annual report provided for in section 38 of the Whistleblower Act, a compilation of information received from the competent authorities on the number of reports, their distribution, their processing and action taken.

## Workload situation

The workload situation of the Office of the Chancellor of Justice was slightly more challenging at the end of 2025 than one year earlier, as more legality oversight cases were filed than were resolved in 2025. At the end of 2025, 932 cases were pending (end of 2024: 590).



## International cooperation

Chancellor of Justice Janne Salminen attended a meeting of Baltic and Nordic ombudsmen and chancellors of justice in Vilnius, Lithuania, on 23 October 2025. The main theme of the meeting was the operations of overseers of legality in a framework of multiple mandates.


The Chancellor of Justice Janne Salminen also attended an expert meeting arranged by the European Agency for Fundamental Rights (FRA) in Vienna on 25–26 November 2025. The discussion there focused on FRA expert consultation on the rule of law and fundamental rights.

The Chancellor of Justice Janne Salminen further met with ombudsmen from Central Asian republics at an event organised by the University of Helsinki and the Ministry of Justice on 28 November 2025 (preliminary remarks on the Paris Principles).

Deputy Chancellor of Justice Mikko Puumalainen attended the 30th anniversary celebrations of Uzbekistan’s ombudsman institution in Tashkent on 27–28 February 2025 and gave a speech at the anniversary seminar on 27 February 2025. He also attended a training session at the Office of the Ombudsman on 3 March 2025 and a discussion at Tashkent State Law University on 4 March 2025.

Deputy Chancellor of Justice Puumalainen further attended a round table discussion on ethnic minorities in the Baltic region in Vilnius, Lithuania, on 24–25 September 2025.

As in previous years, the Office of the Chancellor of Justice contributed to the drafting of the European Commission’s 2025 Rule of Law Report. Evaluation of the rule of law forms part of the EU’s rule of law mechanism.



### 3 Supervising the legality of the official actions of the President of the Republic and of the Government



## Supervising the legality of the official actions of the President of the Republic and of the Government

- The Chancellor of Justice supervises the legality of the official actions of the President of the Republic and of the Government but cannot prevent them from making decisions.
- If the Chancellor of Justice observes something to remark on vis-à-vis the legality of decision-making, the Chancellor must present a justified opinion on the matter. If this opinion is ignored, the Chancellor must enter it into the Government record and take other action as and if necessary.
- Supervision of decision-making is mostly ex ante control. Its purpose is to ensure that any legal issues involved in a decision-making procedure are resolved before the decision proposal is even presented at a plenary session or presidential session of the Government.
- At the decision preparation stage, the Chancellor of Justice issues statements and opinions at the request of ministries on draft decisions and the decision-making procedure from the perspective of legality supervision.





- All documents dealt with at plenary and presidential sessions of the Government are reviewed at the Office of the Chancellor of Justice.
- The Chancellor of Justice sits in on plenary and presidential sessions of the Government and, whenever legality supervision so requires, in Government negotiations, in sessions of the Ministerial Committee on Foreign and Security Policy (UTVA) and joint sessions of the President of the Republic and that Committee (TP-UTVA).
- The Chancellor of Justice deals with complaints concerning decision-making.
- If there is any cause to suspect errors in the procedure after a decision is made, the Chancellor of Justice may conduct an ex post investigation into the matter.
- The Chancellor of Justice reviews the minutes of the plenary and presidential sessions of the Government.





## Legality supervision in bill drafting

### Chancellor of Justice

- supervises legality and compliance with good bill drafting practice but does not participate in the drafting
- particularly supervises compliance with the Constitution and international human rights obligations, the exercising of participation rights, the consistency of legislation and the appropriate consideration of EU law
- systematically monitors the Government's bill drafting plans and requests for statements from ministries
- issues statements from the perspective of legality supervision on draft bills, both on request and at the Chancellor's own initiative
- reviews government proposals at the final stage of preparation, both on request by ministries and at the Chancellor's own initiative
- reviews all government proposals and Government Decrees before they are presented at a plenary session of the Government
- supervises compliance, in decision-making in plenary sessions of the Government, with the feedback given by the Chancellor in statements and ex ante reviews
- issues expert statements on request by Parliamentary Committees



## Duties of the Chancellor of Justice in sessions

- under the Constitution, in the interests of legality supervision the Chancellor of Justice must be present at sessions of the Government and when matters are presented to the President of the Republic
- the Chancellor of Justice shall, upon request, provide the President, the Government and the Ministries with information and opinions on legal issues
- the constitutional obligations of the Chancellor of Justice apply to plenary and presidential sessions of the Government
- the Prime Minister and the President of the Republic have, on occasion, requested a statement on legality from the Chancellor of Justice in a session
- the constitutional obligation of the Chancellor of Justice to provide legal information and statements comprises ex ante legality review, not an advisory service to the Government






- if the Chancellor of Justice observes any legal issues to remark on when reviewing the agenda for a plenary or presidential session of the Government, the Chancellor will ask for any shortcomings and errors to be corrected
  - if the corrections prepared by the relevant ministry are not satisfactory, or if the corrections would be so extensive that there is not enough time to prepare them before the session, the Chancellor will request the item to be removed from the agenda and to be reintroduced, appropriately corrected, in a later session
  - however, the Chancellor of Justice does not have the authority to block a decision by the Government or by the President of the Republic
- under the Constitution, if the Chancellor of Justice observes that the lawfulness any decision or action by the Government or by a minister or by the President of the Republic merits an admonition comment, the Chancellor shall present the admonition with justifications
- if this admonition is ignored, the Chancellor must enter it into the Government record and take other action as and if necessary
  - the threshold for invoking this procedure is high, and this only really becomes relevant if a decision proposal involves a legal issue of such magnitude that a legally acceptable decision is not possible



- it is also stated in the Act on the Chancellor of Justice of the Government that the Chancellor may enter their opinion in the minutes of the Government session if they consider that an item on the agenda involves a legal issue meriting that opinion
  - if, on the basis of a response received to a comment, the Chancellor of Justice rules that there are no legal grounds for objecting to the decision but that there is significant legal ambiguity or other legal circumstances warranting further consideration, the Chancellor may speak on the matter in the Government session and have this entered in the minutes. In such a case, the opinion of the Chancellor of Justice and the content of the statement are recorded in the minutes
  - any statement made by the Chancellor of Justice in a session of Government is also recorded in the case management system of the Office of the Chancellor and generally also posted on the Office's website
- any societally and legally significant requests for rectification and statements regarding sessions made by the Chancellor of Justice are also recorded in the case management system of the Office of the Chancellor





## 4 Supervision of the administration of justice



## Supervision of courts of law and prosecutors

### General

- supervision by the Chancellor of Justice contributes to ensuring that trials are fair and reinforces public confidence in the appropriate administration of justice
- supervision does not intervene in the administration of law within the bounds of discretion of the independent courts
- the authority of the Chancellor of Justice in supervising courts, prosecutors and other authorities as well as the legal counsels of parties to court proceedings allows extensive evaluation of the functioning of the administration of justice
- assigning the supreme overseers of legality the power of bringing charges for suspected offences in office committed by judges and prosecutors safeguards the independence of judges and prosecutors





### Means for supervision of courts

- processing of complaints
- processing of notifications submitted by Courts of Appeal
  - Courts of Appeal have a statutory duty to notify the Chancellor of Justice of any circumstances coming to their attention that might lead to a charge of an offence in office being filed with a Court of Appeal
- processing of notifications submitted by the police
  - the police have been requested to submit notifications of any reports made to them of suspected unlawful acts by a judge in their official capacity
- reviewing penalty judgments
  - random sampling of criminal convictions involving custodial sentences in judgements made by District Courts
- legality oversight visits
- own initiatives

### Means for supervision of prosecutors

- processing of complaints
- processing of notifications submitted by the police
  - the police have been requested to submit notifications of any reports made to them of suspected offences in office by a prosecutor
- legality oversight visits
- own initiatives





## Legality oversight of the courts

An independent judiciary is one of the crucial structural prerequisites of legal protection and one of the cornerstones of a government founded on democracy and the rule of law. Legality oversight of the courts by the Chancellor of Justice respects the independence of the courts and also serves to protect that independence.

### Independent judiciary

The Constitution requires the Chancellor of Justice to ensure that the courts of law, the other authorities and the civil servants, public employees and other persons, when the latter are performing a public task, obey the law and fulfil their obligations. Although courts are here equated with other authorities and persons with public duties in terms of oversight, they have a special status in the legality oversight of the Chancellor of Justice as determined by other provisions in the Constitution. The most important of those provisions is section 3 of the Constitution, which provides for the separation of powers and, in subsection 3, for independent courts of law.

It follows from the independence of the judiciary that the Chancellor of Justice will not intervene in the interpreting of law exercised by a court within its discretion or in the content of the justifications given by a court for its decision, even where a different interpretation might be more justifiable in judicial terms. Legality oversight of the courts can only be directed at clearly faulty justifications, obvious overstepping of discretionary powers or other obvious unlawfulness of a court's decision.





Another safeguard for the independence of the administration of law is that legality oversight is basically never applied to a matter that is currently pending at a court of law or where a party to the matter still has the opportunity to appeal a court's decision to a higher court.

### **Cases concerning offences in office by judges**

The legality oversight of courts of law by the Chancellor of Justice is of a special nature not just because of the independence of judicial authority but also because of the provision in the Constitution regarding the right of the supreme overseers of legality to bring charges. This provision limits the right to bring charges against a judge for unlawful conduct in office to the supreme overseers of legality.

Under the Courts Act, Courts of Appeal have a statutory duty to notify the Chancellor of Justice of any circumstances coming to their attention that might lead to a charge of an offence in office being filed with a Court of Appeal. Such notifications typically lead either to a charge of an offence in office or, more often, to the issuing of a legality oversight reprimand to a judge in a court of first instance.

Although the right to bring charges on suspicion of unlawful conduct in office by a judge is in the exclusive domain of the supreme overseers of legality, the subsequent criminal investigation and assessment of its feasibility in doubtful cases falls under the duties and authority of the police as with all criminal investigations. In his capacity as the special prosecutor in cases involving a suspected offence in office by a judge, the Chancellor of Justice has requested the police to notify the Office of the Chancellor of Justice of any criminal cases brought to the attention of the police that involve a suspected unlawful conduct in office by a judge.



This arrangement helps ensure consistency nationwide in evaluating the threshold for pursuing a criminal investigation in cases of a suspected offence in office by a judge.

In practice, the Chancellor of Justice only rarely orders charges to be brought against a judge for suspected unlawful conduct in office. Over the past ten years, there have been only 13 such cases, i.e. slightly more than one per year on average. In 2025, charges were brought in two matters, OKV/687/30/2023 and OKV/221/31/2023.

### **Reviewing penal sentences**

Reviewing penal sentences is one of the statutory duties of the Chancellor of Justice. Sentences are reviewed by random sampling predetermined by the Deputy Chancellor of Justice. These are reviewed to ensure that the mandatory provisions in law have been complied with.

This system being based on random sampling, it cannot catch all errors committed by courts of law, nor is it intended to. It does, however, effectively bring out repeated and common errors, and it is to address these that the review of penal sentences is primarily intended.

The most common consequence of an error found is an opinion issued to the judge in question. An error may also lead to a petition being filed with the Supreme Court to overturn the sentence. A petition to overturn is generally filed in cases where the error discovered is considered to have caused the defendant harm or damage. A petition to overturn may, for instance, prevent a person sentenced from being subjected to loss of liberty without cause.





It has been decided that the review of penal sentences should be improved so as to target matters of high relevance for legal protection and so as to gather relevant information from other observations in the review process and convey that relevant information to the courts in general.

### **Effectivity and coverage of legality oversight**

Any charges brought by the Chancellor of Justice are tried by independent courts of law as in all criminal cases. Legality oversight is not a disciplinary procedure, and the Chancellor of Justice cannot impose sanctions on a judge.

**Legality oversight of courts is mainly about overseeing procedural legal protection.**

Legality oversight of courts is mainly about overseeing procedural legal protection.

The duty of legality oversight assigned to the Chancellor of Justice in the Constitution is intended to safeguard the independence and uninterrupted operation of courts of law and other judicial bodies while boosting public confidence in the judicial system.

The oversight of trial counsels, prosecutors and courts of law, and also of the criminal investigation authorities in the criminal investigation process, forms an entity with comprehensive coverage such that e.g. in a case involving a suspected offence in office by a judge that proceeds to investigation, or in a case where a penal sentence is being reviewed, the actions of any other parties involved may be evaluated at the same time.





It has often been mentioned in explanations returned by District Courts that errors caused by an excessive workload could be prevented if the electronic procedure system used by the District Courts were to warn the judge if a decision is unlawful. It has long been the opinion of the Chancellor of Justice that in the context of legality oversight it is important to support the development of automation supporting the administration of law. Information system development has been discussed during on-site legality oversight visits to the National Courts Administration, and observations made in the course of legality oversight activities have been forwarded to that institution.

Monitoring of information system development was continued in the year under review. The substitute for the Deputy Chancellor of Justice made favourable note of the development measures announced by the National Courts Administration, as a result of which functions to support the administration of law might be implemented to prevent errors from being made for instance in issuing summons and setting the notification deadline thereof (OKV/2521/70/2022 and OKV/3016/70/2025).





## Supervision of attorneys-at-law, public legal aid attorneys and licensed legal counsels


- Supervision of attorneys-at-law, public legal aid attorneys and licensed legal counsels is mainly the domain of the Disciplinary Board and of the Board on Trial Counsel
- The Chancellor of Justice cannot impose any disciplinary sanctions on an individual attorney-at-law or public legal aid attorney or licensed legal counsel
- The Chancellor of Justice supervises the Disciplinary Board and the Board on Trial Counsel to ensure that they are in compliance with good governance and respect basic and human rights
- Complaints concerning actions of attorneys-at-law, public legal aid attorneys and licensed legal counsels may be filed directly with the Disciplinary Board
- If a complaint concerning actions of an attorney-at-law, a public legal aid attorney or a licensed legal counsel is submitted to the Chancellor of Justice, it may be forwarded to the Disciplinary Board





- The Chancellor of Justice will not, however, forward any non-specific or obviously unfounded complaints to the Disciplinary Board
- The Chancellor of Justice may file an oversight case with the Disciplinary Board if, in the Chancellor's opinion, an attorney-at-law, a public legal aid attorney or a licensed legal counsel has neglected their duties
- The Disciplinary Board and the Board on Trial Counsel submit their decisions to the Chancellor of Justice
- The Chancellor of Justice reviews the decisions and may appeal them to the Helsinki Court of Appeal. The appeal period is 30 days from the date when the decision is received by the Office of the Chancellor of Justice
- The Helsinki Court of Appeal reserves the right of reply to the Chancellor of Justice in appealed cases if a case is filed in some other way than by a complaint from the Chancellor of Justice
- The Chancellor of Justice ensures the safeguarding of basic and human rights, legal protection, good governance and legal certainty from the perspective both of clients of judicial services and of the common good
- The Chancellor of Justice also investigates complaints concerning the procedures of the Disciplinary Board or of the Board on Trial Counsel





## 5 Legality supervision of authorities and other parties performing public duties



## Supervision of the activities of authorities

### General

- the legality oversight conducted by the Chancellor of Justice on courts, public authorities and the Government is a single, interactive entity
- the legality of activities of authorities and the implementation of basic and human rights are evaluated using the means of legality oversight at the disposal of the Chancellor of Justice, in various combinations
- supreme legality oversight of the supervision conducted by other authorities is geared towards overseeing the effectiveness and efficiency of that supervision

### Means of supervision

- processing of complaints
- legality oversight visits
- own initiatives

### Goals of supervision

- the goals of the supervision include ensuring that the actions of public authorities are of a good quality and expediently performed





### **Processing of complaints**

- the Chancellor of Justice will investigate a complaint if there is a suspicion that a person, an authority or other entity subject to the Chancellor's supervision has acted unlawfully or neglected to perform their duty, or if in the Chancellor's opinion there is another reason to do so
- the Chancellor of Justice will undertake measures considered appropriate in the interests of compliance with the law, legal protection or the implementation of basic and human rights
- an investigation will be performed in the case to the extent considered necessary by the Chancellor of Justice

### **Legality oversight visits**

- allow evaluation of the coherence of the operations of authorities and of common errors in application practice, among other things
- have a preventive impact and may bring up new oversight issues
- promote interaction and exchange of information with the parties overseen
- may reveal information on shortcomings and issues in legislation

### **Own initiatives**

- focus particularly on structural issues, such as legality issues on a scale broader than any individual complaint, or shortcomings in legislation, guidelines or training of officials
- are a way of highlighting latent problems and the status of vulnerable population groups
- are prompted for instance by observations made in legality oversight measures and in media monitoring





## Consequences

- reprimand
- exhortation to comply with the law or with good governance
- measures to correct the matter (specifically, an additional appeal in cases having to do with the administration of law)
- the supreme overseers of legality may direct charges to be brought and pursue such charges in a case falling within their legality oversight purview
- the Chancellor of Justice may further make proposals for improving or amending provisions or rules if any shortcomings or discrepancies have been discovered in these through supervision measures, or if they have caused confusion or conflicting interpretations in the administration of justice or in administrative procedures





## 6 Whistleblower protection





## Whistleblower protection

### General

- Whistleblower protection based on the Whistleblower Act protects persons submitting notifications on particular types of misconduct, prohibiting retaliation against such persons.
- A whistleblower may report misconduct observed in connection with their work, for instance in public procurement, financing services, food safety, environmental protection, consumer protection, online security or information system security.
- Notifications on misconduct in an organisation should principally be filed through the organisation's internal notification channel.
- In some cases, it is justifiable to submit a notification directly through the centralised external whistleblower channel of the Office of the Chancellor of Justice.





## **Centralised whistleblower channel of the Office of the Chancellor of Justice**

- Under the Whistleblower Act, it is the duty of the Office of the Chancellor of Justice to maintain a centralised channel where whistleblowers may file a notification in writing or orally. The identities of whistleblowers are protected.
- Notifications are not investigated by the Office of the Chancellor of Justice itself, nor does the Office verify whether the criteria for taking action or for whistleblower protection are satisfied.
- The Office of the Chancellor of Justice forwards notifications from the whistleblower channel to the competent authority. However, notifications that clearly fall outside of the scope of application of whistleblower protection are not forwarded to the competent authorities.
- The competent authority investigates whether the notification is accurate, estimates whether the Whistleblower Act applies to the notification and to the notifier, takes the necessary action and informs the notifier about the action taken.
- The competent authority is the authority whose statutory duty it is to monitor misconduct and to process notifications of them.





## Reporting

- The competent authorities must report annually to the Office of the Chancellor of Justice on all notifications submitted pursuant to the Whistleblower Act, on how they were investigated and on what the outcomes were.
- The Office of the Chancellor of Justice further reports annually to the European Commission, giving the number of notifications and other information provided by the competent authorities, in accordance with the guideline issued by the Commission.

## Legality supervision by the Chancellor of Justice

- Notifications made through the whistleblower channel of the Office of the Chancellor of Justice are not processed as complaints by the Office.
- Part of the legality supervision conducted by the Chancellor of Justice includes ensuring that the competent authorities fulfil their obligations under the Whistleblower Act.





## Centralised whistleblower channel of the Office of the Chancellor of Justice

The Act on the Protection of Persons Reporting Infringements of European Union and National Law (1171/2022) entered into force on 1 January 2023. On that date, a centralised channel for submitting notifications was opened by the Office of the Chancellor of Justice. The centralised channel for submitting notifications has now been in operation for three years. During 2026, the Office of the Chancellor of Justice intends to draw up an assessment of the activities of the centralised channel for submitting notification in section 39(1) of the Act on the protection of reporting persons and in accordance with the Directive on the protection of reporting persons in accordance with the obligation laid down in Article 14.

The number of notifications submitted through the channel remained rather low in 2025. The majority of the notifications that were submitted fell clearly beyond the scope of application of the Whistleblower Act and were thus not forwarded to the competent authorities for investigation. Nor can reports be processed by the Chancellor of Justice as addressed complaints, as the Act on the protection of whistleblowers lays down special procedures for processing reports. The number of notifications forwarded to the competent authorities is so small that no conclusions can yet be drawn for instance on whether there are any specific problem points in the domains covered by the Act.

The Office of the Chancellor of Justice has set up a network of authorities to support the system, including reporting procedures. The Office of the Chancellor of Justice requested the competent authorities to return, by 1 March 2026, reports on the number of notifications they had processed and their investigative measures in the year under review. The Office received information from 97 authorities. The 2025 report to the European Commission was compiled on the basis of those reports. According to this compilation report, the authorities received 82 notifications and entered into investigations for 63 notifications. A total of 2 reports led to the initiation of a police investigation. None of them led to court proceedings being initiated.



It is now an established element of the legality supervision conducted by the Chancellor of Justice to review the actions of authorities in complying with the Whistleblower Act in the course of legality supervision visits.



## 7 Attachments





## Appendix 1. Statistics

### Overseeing the legality of the official actions of the President of the Republic and of the Government

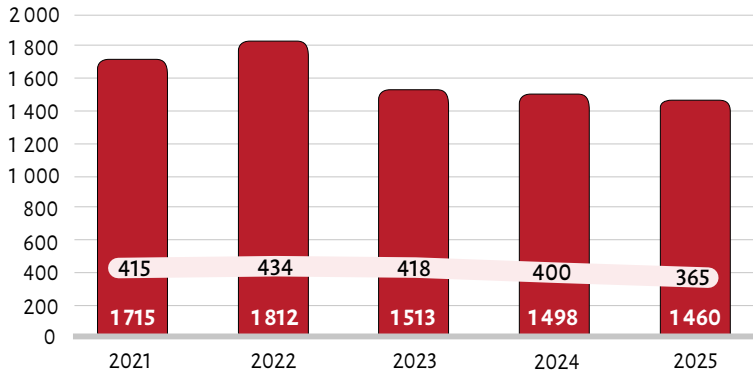
#### Plenary and presidential sessions of the Government


<b>Sessions</b>	83
Plenary session of the Government	56
Presidential session of the Government	27


<b>Cases dealt with</b>	1,825
Plenary session of the Government	1,460
Presidential session of the Government	365

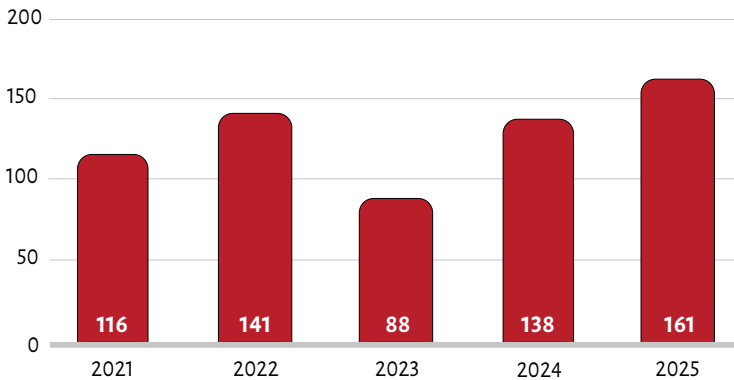
<b>Measures taken</b>	459
Opinions given by the Chancellor of Justice <sup>26</sup>	62
Requests to correct presentation documents	397
• correction requests as a percentage of all cases dealt with at sessions	22%
• judicial corrections as a percentage of all correction requests	80%


<sup>26</sup> As per section 108 of the Constitution, the Chancellor of Justice gives opinions at the request of ministries during preparation and at the Chancellor's own initiative when reviewing presentation documents. Any opinions that are of significance in respect of the exercising of public power are put on record.



 Cases dealt with at plenary sessions of the Government

 Decisions made by the President of the Republic in a session of the Government



 Requests for statements and opinions from the President of the Republic, from the Government and from ministries (excluding the requests for information or statements referred to in section 108(2) of the Constitution)



### Legality oversight of legislative proposals

Requests for statements from ministries	161
• statements returned	68
Ex ante reviews of legislative proposals	52
Government proposals reviewed	206
Government Decrees reviewed	223
Requests to be heard by Parliamentary Committees	16

### Complaints

Decisions concerning the Government and ministries	213
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## Cases concerning offences in office by judges

**Cases filed** 107

Notifications to the Chancellor of Justice	
• from the Courts of Appeal	10
• from the police	92
• from the prosecutor	5

**Cases resolved** 95

Measures taken	18
• charges brought	1
• reprimand	15
• opinion	2
No action necessary	77

## Cases concerning offences in office by prosecutors

**Cases filed** 77

Notifications to the Chancellor of Justice	
• from the police	70
• from the prosecutor	7

**Cases resolved** 52

No action necessary	50
Referred to the Parliamentary Ombudsman	2



## Reviewing penal sentences

Sentences reviewed	3,038
Cases filed on the basis of a review	93
Petitions to the Supreme Court to overturn a sentence	3
<b>Cases resolved</b>	<b>51</b>
Measures taken	28
• charges brought	1
• reprimand	12
• opinion	15
No action necessary	25



## Oversight of attorneys-at-law, public legal aid attorneys and licensed legal counsels and the Disciplinary Board and the Board on Trial Counsel

### Cases filed 734

Oversight and fee disputes	569
Other Oversight (including decisions by the Board on Trial Counsels, requests for statements from the Helsinki Court of Appeal and notifications from prosecutors)	165

### Cases resolved 662

Measures taken	5
• notified to the Disciplinary Board	1
• statement	3
• referred to the Disciplinary Board	1
No action necessary (ad acta)	657

All decisions made by the Disciplinary Board and by the Board on Trial Counsels are reviewed by the Office of the Chancellor of Justice.

### Complaints 68

Complaints taken up for detailed legality oversight scrutiny	
• attorney-at-law, public legal aid attorney, Disciplinary Board	59
• licensed legal counsel, Disciplinary Board, Board on Trial Counsels	9



**Complaints resolved** 67

**Complaints requiring an investigation** 35

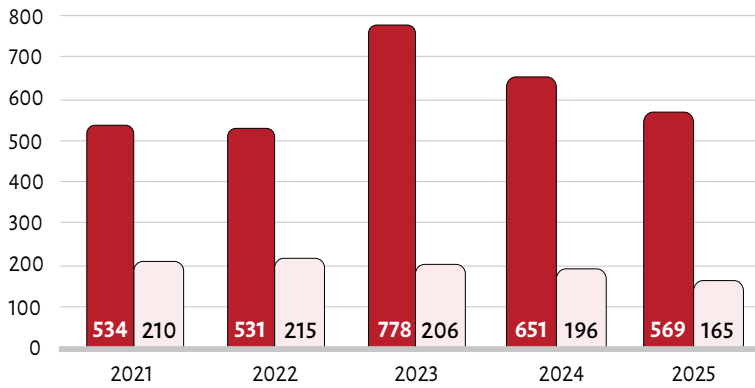
Measures taken	1
• opinion	1



**Complaints leading to no action required** 34

No misconduct was found	34
-------------------------	----

**Complaints not requiring an investigation** 32

Filed with the Disciplinary Board or a competent authority, or subject to appeal	7
Referred to the Disciplinary Board or to the Board on Trial Counsels	8
Not within the jurisdiction of the Chancellor of Justice	2
Was too unspecific to investigate	7
Lapsed for other reasons	6
Processing terminated (ad acta)	2



-  Decisions by the Disciplinary Board on supervision and fee dispute cases received for review
-  Other oversight of attorneys-at-law (including decisions by the Board on Trial Counsels, requests for statements from the Helsinki Court of Appeal and notifications from prosecutors)

## Legality oversight of authorities and other parties performing public duties

### Complaints<sup>27</sup>

**Complaints filed** 2,090

**Complaints resolved in a limited process** 432

complaints terminated (ad acta)<sup>28</sup> 97

complaints referred to in section 3 of the Act on the Division of Duties  
Between the Chancellor of Justice of the Government and the Parliamentary  
Ombudsman (330/2022) transferred to the Parliamentary Ombudsman 335

**Complaints taken up for detailed legality oversight scrutiny<sup>29</sup>** 1,658

Complaints concerned the following authorities or topics  
(note that a single complaint may involve multiple topics)

the Government or ministry 205

administrative branch of the Ministry for Foreign Affairs 7

administrative branch of the Ministry of Justice 75

general court of law 222

administrative court 38

special court 3

prosecutor 76

enforcement authority 61

attorney-at-law, public legal aid attorney, Disciplinary Board 59

<sup>27</sup> General statistics on complaints, including data on all complaints filed with the Office of the Chancellor of Justice and their processing.

<sup>28</sup> These are written opinions, writings submitted for information or follow-up writings on cases already resolved. In these cases, an evaluation of whether they need to be processed is made immediately after registration, and they are terminated without further action.

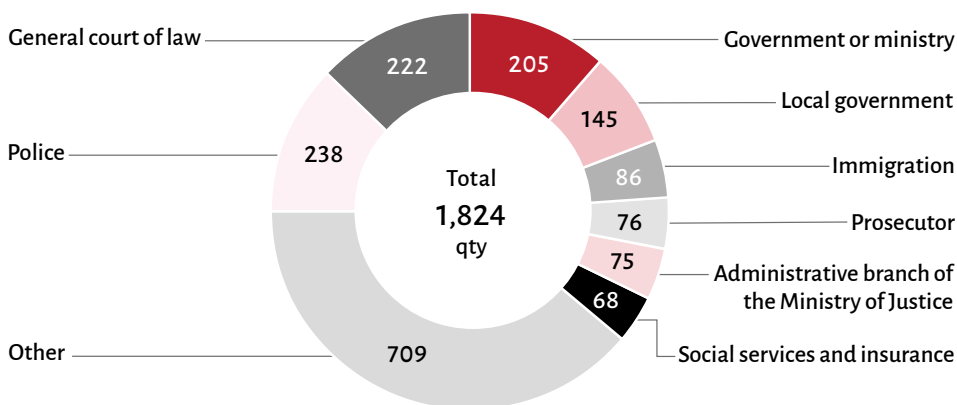
<sup>29</sup> The case is assigned to a presenting officer for preparation and presentation to the decision-maker (Chancellor of Justice, Deputy Chancellor of Justice or Substitute for the Deputy Chancellor of Justice).



licensed legal counsel, Board on Trial Counsels	9
administrative branch of the Ministry of the Interior	13
police	238
immigration	86
administrative branch of the Ministry of Finance	48
local government	145
taxation	44
administrative branch of the Ministry of Education and Culture	57
administrative branch of the Ministry of Agriculture and Forestry	37
administrative branch of the Ministry of Transport and Communications	44
administrative branch of the Ministry of Economic Affairs and Employment	22
employment authority	12
administrative branch of the Ministry of Social Affairs and Health	16
social services and insurance	68
health care	58
administrative branch of the Ministry of the Environment	6
environmental authority	35
other authority or party with public duties	80
other matter	60

### Complaints taken up for detailed legality oversight scrutiny, qty

Complaints concerned the following authorities or topics  
(note that a single complaint may involve multiple topics)





**Complaints resolved** 1,982

**Complaints resolved on presentation<sup>30</sup>** 1,550

**Complaints requiring an investigation** 853

Measures taken	120
• reprimand	13
• opinion	103
• other action	4
Complaints leading to no action required	733
• incorrect procedure, no action required	11
• no misconduct was found	722

**Complaints not requiring an investigation** 838

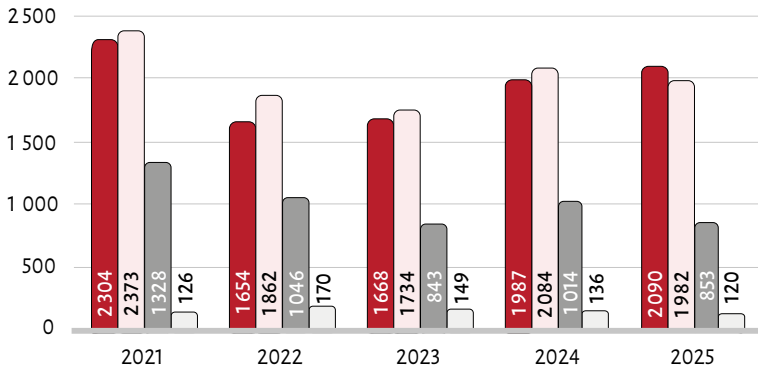
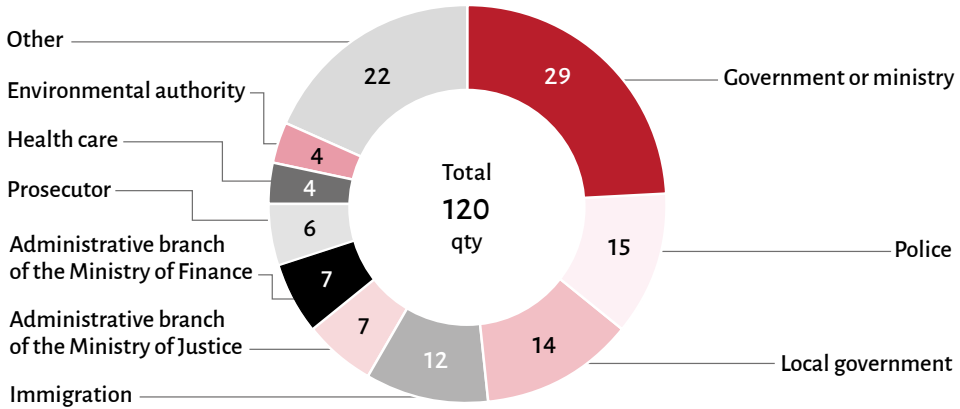
Referred to the Parliamentary Ombudsman	43
Referred to the Disciplinary Board	8
Referred to the competent authority	51
Filed with the competent authority, or subject to appeal	209
Not within the jurisdiction of the Chancellor of Justice	130
Concerned a case more than two years old	57
Was too unspecific to investigate	128
Lapsed for other reasons	145
Processing terminated (ad acta)	67

For statistical purposes, a single complaint decision may be recorded as multiple measures or grounds for termination of processing; and on the other hand, multiple recorded measures or grounds for termination may result from a single decision resolving several complaints at once.

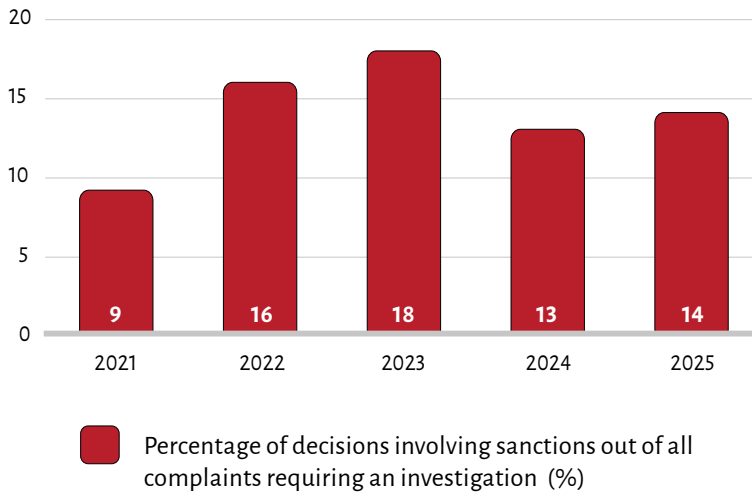
<sup>30</sup> Complaints that were presented by a presenting officer and decided by the Chancellor of Justice, Deputy Chancellor of Justice or Substitute for the Deputy Chancellor of Justice and not taken up for detailed legality oversight scrutiny.



### Complaints leading to sanctions, principal target groups, qty



- Complaints received
- Complaints resolved
- Complaints requiring an investigation
- Sanction decisions made on complaints  
(the statistics for complaints include complaints concerning the President of the Republic, the Government, attorneys-at-law, public legal aid attorneys and licensed legal counsels)



## Centralised external whistleblower channel

Notifications received	108
Notifications referred to a competent authority	22
Notifications not transferred (did not fall within the scope of application of the Act)	86

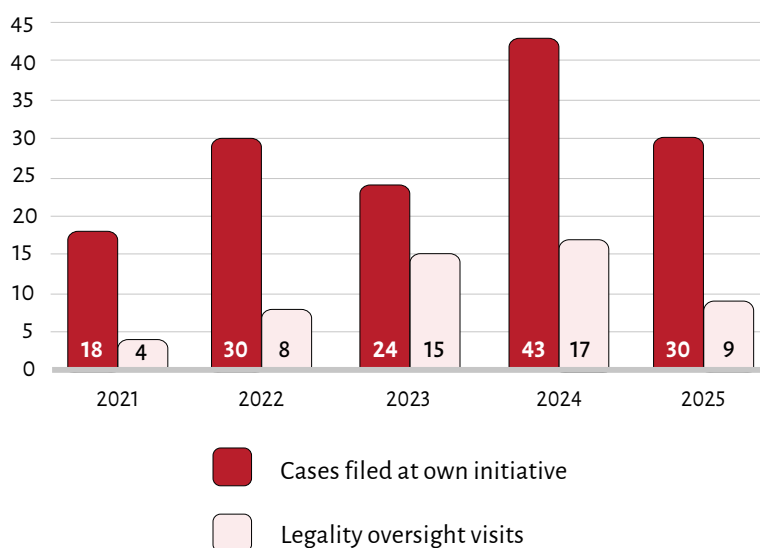
## Own initiative and on-site legality oversight visits

**Cases filed at own initiative** 30

**Resolved cases filed at own initiative** 55

Measures taken	50
• reprimand	7
• opinion	33
• proposal to improve legal rules	2
• proposal for compensation	1
• other action	7
No action necessary	7

**Legality oversight visits** 9





## Workload situation

**Cases filed in 2025** 3,359

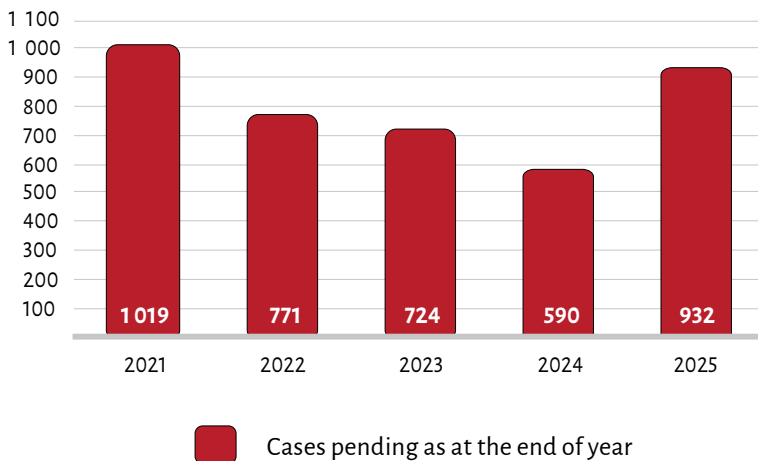
Complaints	2,090
Other legality oversight cases	1,269

**Cases resolved in 2025** 3,116

**Cases pending as at the end of 2025** 932

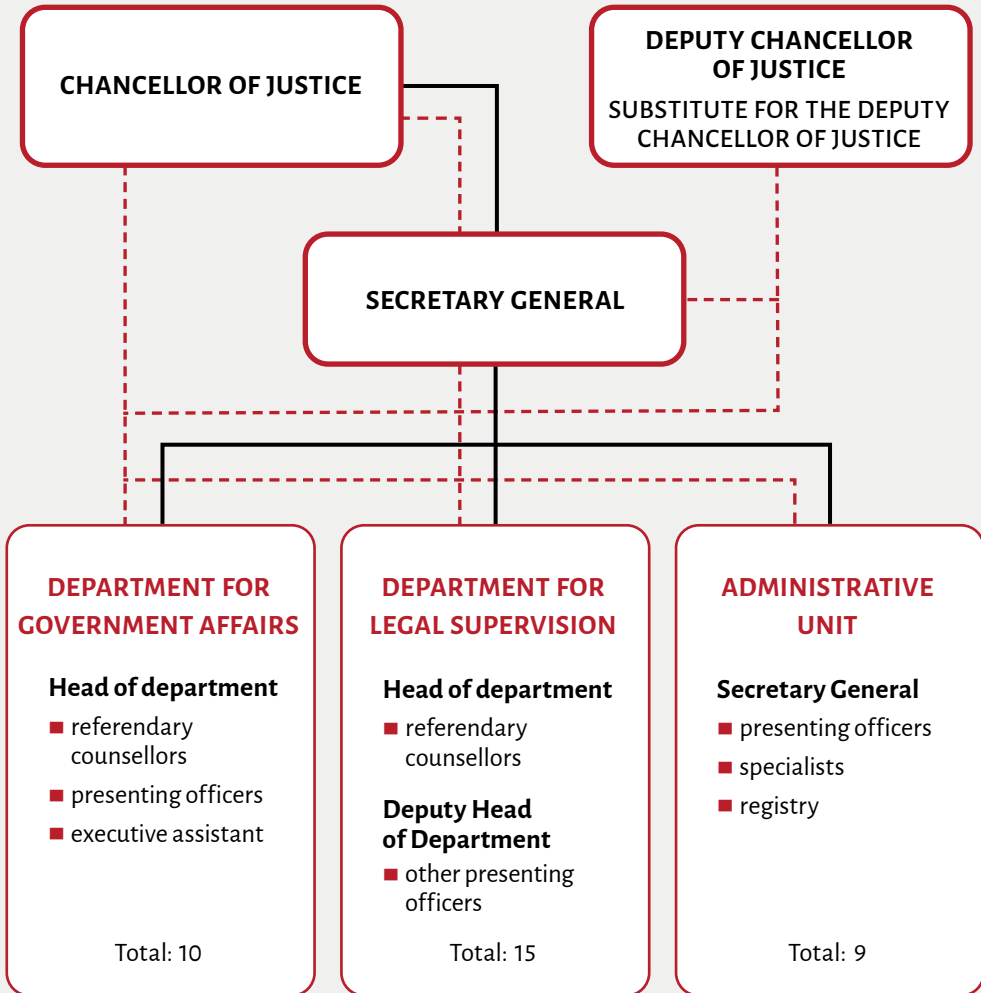
Other legality oversight cases received in 2022	2
Other legality oversight cases received in 2023	5
Complaints and other legality oversight cases received in 2024	70

At the end of 2025, there were 932 pending cases, among which 31 complaints had been pending for more than one year.





## Appendix 2. Organisation of the Office of the Chancellor of Justice



———— Managerial and organisational relationship

- - - - - Presentation relationship in legality oversight



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