

Clarification 1. Rationale for counting in-donor refugee costs as ODA **Q1/ Describe in a nutshell the asylum procedure in your country.**

Asylum seeking process in Finland

A total of 5 046 individuals sought asylum in Finland in 2017. The number of asylum applications was a little bit lower than the previous year (5 646). However, it should be noted that the number of subsequent applications for asylum increased considerably from the previous year: In 2017, 1 845 subsequent applications for asylum were left which was 36.5 % of the total number of asylum applications. A year before, the corresponding figure was 14.8 %.

In 2017, most of the asylum seekers came from Iraq (1 453). The number of Syrian asylum seekers was also high (744). The third biggest group was Eritrean asylum seekers (435).

In 2017, a total of 9 418 (2016: 28 208) decisions on asylum applications were made. The average processing time for an asylum application was 357 days (2016: 261 days). The number of decisions was significantly lower, and the processing time longer compared to the previous year because of limited personnel resources. The Finnish Immigration Service started the recruitment of new staff in the end of 2017.

The percentage of positive decisions on asylum applications increased between 2017 and 2018. Positive asylum decisions (3 784) accounted for 40.2% of all decisions in 2017. Most (4 337) of the decisions were given for Iraqis' applications of which 33% were positive and 53% negative. Other applications were expired or dismissed. Afghans were the second largest group with 1 590 decisions given, of which 41% were positive and 49% negative. Almost all the asylum applications of Syrians (95%) were given positive decisions.

One's application for international protection can be processed in an accelerated procedure if the Finnish Immigration Service considers it to be manifestly unfounded. An application is manifestly unfounded if, for example, the applicant comes from a safe country of origin where she/he may be returned.

Currently (December 2018) there are 49 reception centres operating, of which 43 are for adults and 6 for minors.

In the Dublin procedure, the applicant is registered to the accommodation register of reception centres (UMAREK) when the applicant has made the application for asylum. The applicant is directed to the reception centre until a decision for the application for asylum has been made. In other words until that time the applicant has left the country. Dublin procedure is followed at the reception centre to which the applicant has been registered as a customer. Costs include reception services of the applicant and the travel expenses of the Dublin return.

Living in a reception centre

You need to be within the Finnish territory when you apply for asylum in Finland. You cannot apply for asylum for example by sending a letter or an e-mail to the Finnish Immigration Service. It is also impossible to apply for asylum at a Finnish mission (embassy or consulate) located outside Finland.

There is no application form that you can use to apply for asylum in advance. The only way to apply for asylum is to talk to a police or a border control official in Finland.

If you have applied for asylum in Finland, you will be accommodated at a reception centre. The place where you will stay will depend on your age, gender and other circumstances. Additionally, Finland organises accommodation in a way that makes it possible for family members to live together in the same place if they want to. Persons under the age of 18 who arrive in Finland without a guardian are accommodated at a group home or a supported housing unit.

You may not be able to always stay in the same reception centre. You and your family may be transferred to another reception centre if this is necessary because of your personal situation, reception centre operations or the processing of your asylum application.

The first place where asylum seekers usually stay is called a transit centre. The transit centres are located near the service points of the Finnish Immigration Service that hold asylum interviews. These centres are primarily meant for new asylum seekers who have just arrived in Finland. After an asylum seeker has had an asylum interview, he or she will be transferred to another reception centre to wait for a decision.

There are many reception centres of different types and sizes in different parts of Finland.

Different kinds of reception centres:

- reception centres with catering, where the reception centre offers meals to everyone who lives there
- reception centres with individual or shared kitchens where the asylum seekers cook their own meals

Reception centres are maintained by many operators: the Finnish Immigration Service, Finnish municipalities, organisations and companies. All reception centres offer the same [reception services](#) to the people who live there, and all reception centres operate according to the same principles. The Finnish Immigration Service directs, plans and supervises the practical operations of all reception centres.

The reception of asylum seekers is steered by the [Finnish Act on the Reception of Persons Applying for International Protection](#).

If asylum seeker receives a positive decision on his/her asylum application, she/he gets to move to own apartment. After an apartment has been found and she/he has moved out of the reception centre, she/he will no longer be a client of the Finnish Immigration Service. From that day on, the person will be a resident of a municipality. Her/his home municipality will organise basic services for her/him, such as health care, and a school place for your children. A quota refugee does not live at a reception centre in Finland. Instead, a home municipality and an apartment will be found before the person moves to Finland.

Reception allowance

As an asylum seeker, you may get financial assistance while Finland processes the application. This money is called the reception allowance. The reception allowance is granted by the reception centre and paid by the Finnish state. It is meant for your necessary basic needs.

If you want to receive reception allowance, you need to apply for it. Your reception centre will give you instructions on how to apply for the allowance. All income and funds you have at your disposal reduce the amount of your reception allowance. When you apply for the reception allowance, you must tell the reception centre whether you receive a salary or have other assets or sources of income. Also the income and funds of your spouse affect the amount of your reception allowance.

Children who have arrived in Finland without a guardian also get financial support. However, they get a smaller sum than adults or families. This money is called spending money.

If you or your family have special needs for which you need additional financial support, you may be granted a supplementary reception allowance.



The reception allowance is uploaded to your prepaid card or given to you in cash.

Amount of reception allowance

The basic component of the monthly reception allowance from 1 January 2018

	No meal service	Meals at the reception centre
A single parent, living alone	312.23 euros	91.52 euros
Other persons over 18 years	263.78 euros	75.36 euros
A child who lives with his or her family	199.18 euros	59.21 euros

The monthly spending allowance for the unaccompanied minor asylum seekers from 1 January 2018

	Meals at the reception centre
an unaccompanied minor under 16 years	26.92 euros*
an unaccompanied minor between 16 and 17 years	48.44 euros*

*A spending allowance may also be a lesser amount if considered reasonable in view of the minor's age and level of development.

An unaccompanied minor living in private accommodation or a support housing unit intended for those over 16 years of age will be paid a reception allowance instead of a spending allowance. This will equal the allowance of an adult living alone.

Clarification 2. Meaning of the term "refugees"

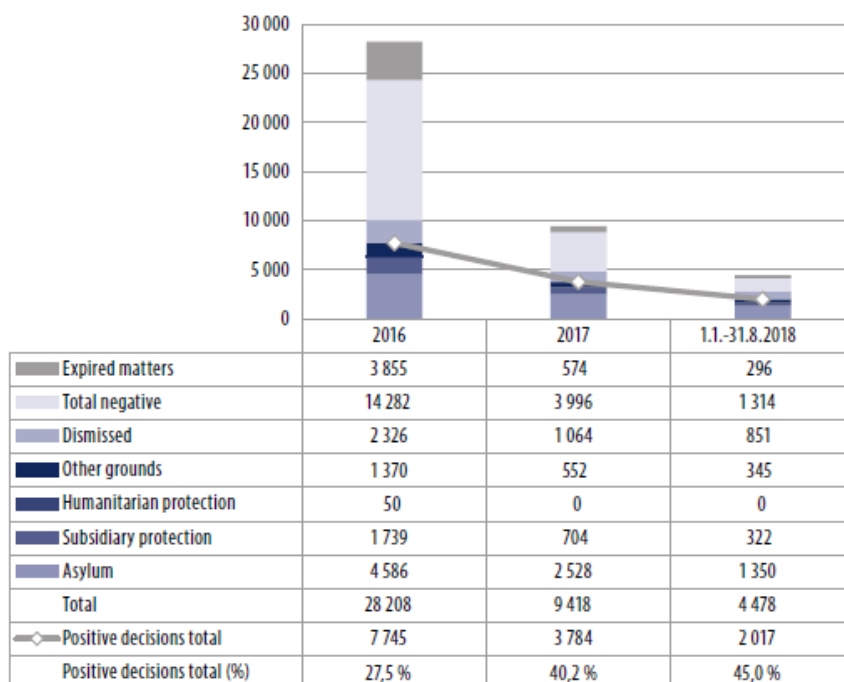
Q2/ Indicate the categories of refugees for which costs are included in your ODA reporting: asylum seekers, recognised refugees, persons granted temporary or subsidiary protection.

Until 2018 figures: asylum seekers who received positive decision and quota refugees.

From 2019 figures onwards: all asylum seekers up to final decision (max 12 months), recognised refugees, persons granted temporary or subsidiary protection and family reunifications for the first 12 months.

In 2018, 1,976 asylum seekers received negative decision on his/her application. In addition, 1,288 applications were dismissed and 375 expired. Total applications processed for 2018 were 6379, so the final rejection share for 2018 was 57 %.

Figure 18 Decisions on asylum applications between 2016–August 2018



Source: The Finnish Immigration Service

Costs related to dismissed applications and expired matters are not included in ODA. Dismissed application means that a complete substantial investigation into the application has not been conducted. The Finnish Immigration Service may choose to dismiss an asylum application and not process it if, for example, the asylum seeker has arrived to Finland from a safe country or if another country is responsible for the processing of the application.

Expired matters means that the application has expired. The application expires, for example, if the applicant cancels his or her application or if the applicant who has submitted his or her application in Finland is likely to have moved out of the country.

Clarification 3. Twelve-month rule

Q3/ When does the twelve-month rule start (date of application, date of entry into the country, date of start of support)?

For asylum seekers, the 12-month-rule starts when the asylum application has been registered. For quota refugees, it is the date of entry into the country. Currently as the expenses are calculated by multiplying the average daily cost with the average time of processing an application, there may be subsequent applicants who actually have stayed longer time than 12 months.

Subsequent application is a new asylum application, that can be submitted once a final decision on the previous application has been made and if there are new grounds for an asylum that were not presented before. The Finnish Immigration Service will conduct a preliminary assessment based on this new information and decide whether the new application will be examined or not. There also has to be a reason why the new grounds were not presented earlier.

Finland has been using the following formula:

$(\# \text{ of applicants granted asylum}) * (\text{average days spent in reception centre}) * (\text{costs per day in reception centre}).$

In the reporting, Finland uses the average processing time of applications and because of that, Finland cannot ensure that all the applications are being processed in 12 months.

Clarification 4. Eligibility of specific cost items

Q4/ Provide the list of cost items included in ODA for each category of refugee and a justification for their inclusion.

Expenses in reception centre include:

- Employees at reception centres (incl. add-on costs)
- Real estate costs of the reception centres (rent, heating, water, cleaning, maintenance (no construction costs))
- Security services
- Equipment and accessories (e.g. clothing, bed linen, books, magazines, office supplies)
- Other services purchased (e.g. food, healthcare, translation, employment and study activities)
- Reception allowance
- Employment and study activities

Other expenses:

- Basic health care
- Language and training in municipalities
- Resettlement programme
- Voluntary return

"Security service" are a part of personnel costs. The guarding services are used according to consideration in the reception centres. The guarding services can be used for example on days, when the reception money is paid. The services have also been used daily in the few largest reception centres.

The health care includes basic health care at reception centre and doctor services in private or in public sector. The asylum-seekers' health services and their scope is prescribed in the law. If asylum seeker needs to get special health care, it is possible through the private or municipal doctor's letter. The services of the health care of the maternity clinic and of the mouth is provided by the municipal health care.

"Employment and study activities" are part of reception services, which are offered in the reception centres. Their purpose is to promote the activity and independent initiative of the asylum-seekers and increase the welfare of asylum seekers. Employment activities are for example cleaning or different kind of maintenance work. Study activities includes the elementary course of the Finnish society for over 16-year-old asylum seeker and they study Finnish language every week. Employment and study activities are obliging, because according to the law, the customer's reception money can be reduced, if he/she without a justifiable reason repeatedly refuses the work activity.

Cost items reported under "municipality" include imputed subsidy for: income support (paid through social security institution, KELA) and interpretation costs, health care, child welfare and reception costs for underage asylum seekers travelling without a custodian. Cost items cannot be reported by individual. Costs from previous year are added up and divided by the number of refugees that are receiving the support, which gives us the average cost per refugee.

"Language and training in municipalities" includes basic language training and teaching practical information on Finnish society. This is organised externally. Municipalities can also organise such trainings. Prices are determined by a bidding competition.



Costs under “resettlement programme” include costs, which are related to the arrival, for example trips and travel documents. It also includes logistic expenses which are related to the choice trips travel expenses to Finland. Finland buys the service from international organization for migration (IOM) and also pay some expenses to Finnish red cross.

Cost under “voluntary return” include travel expenses from the person’s current location to the final destination, (flights costs, interface transports to the airport in Finland and travel expenses on return country to place of domicile).

Voluntary returns is targeted to the following groups:

- persons who have received a negative decision on their asylum application
- persons who have withdrawn their asylum application
- victims of human trafficking who do not have a municipality of residence in Finland
- persons who have received temporary protection
- persons who have been granted a temporary residence permit because they cannot be removed from the country, but who do not have a municipality of residence in Finland
- persons whose international protection status in Finland has been withdrawn or cancelled and a decision has been made to deport them

NOT included: VAT, costs related to detention, human trafficking, administrative expense reimbursement (In our model Administrative expense reimbursement is based on contracts and it is separated from other costs. Administrative expense reimbursement includes personnel involved in management, human resources and IT.). Finland will exclude costs for voluntary returns in future as returns has reported as a whole and could also include partly rejected decision.

Clarification 5. Methodology for assessing costs

Q5/ Describe the methodology used for assessing ODA-eligible costs and provide the actual data points and detailed calculations used to reach the figures reported as ODA.

All costs are calculated ex-post, based on the average length of the process multiplied by the daily/annual costs and number of asylum seekers/refugees.

Does your domestic reporting system allow for tracking expenditures at the level of individual asylum seeker/refugee and for reporting the eligible costs for the first twelve months of stay? If yes, please describe the system used. If not, please describe the assumptions and estimates used to assess costs.

Individual-based tracking of expenditures would be very difficult. For that reason, Finland is using estimates based on the average lengths and daily/annual costs.

Is the same methodology used to assess costs for different categories of refugees?

Yes.

How does your methodology ensure there is no double-counting (e.g. counting the costs for the same person for 12 months as an asylum seeker and another 12 months as a refugee granted status)?

Finland has estimated an average daily cost per person for the time in the reception centres and an annual cost per refugee for the time in the municipalities. Depending on the average time spent in the reception centre, the expenditures per refugee is counted as a weighted average of these two, so there is no overlap.

Finland has been using the following formula:

$$(\# \text{ of applicants granted asylum}) * (\text{average days spent in reception centre}) * (\text{costs per day in reception centre}) \\ + (\# \text{ of applicants granted asylum}) * ((\text{days in year} - \text{days in reception centre}) / (\text{days in year})) * (\text{annual costs in municipalities})$$


So the formula does not count the costs for the same period in reception centre vs municipality.

Do you use imputations when refugees benefit from the services available to all citizens (e.g. education or health)? How do you clearly define the estimate of the number of refugees/asylum seekers benefiting from a particular service for up to 12 months?

Refugees and asylum seekers have their own budget line for health services in reception centres so they can be separated. Costs of education per person are available separately for immigrants in instruction preparing for basic education, and the average cost for refugees/asylum seekers is assumed the same.

What estimates do you use? What is their source and their frequency of updating?

- Average days spent in reception centre=based on actual time spent in reception centre in total. Does not separate rejected applicants (nor applicants from non-ODA countries), although they haven't been reported in the totals.
- Average daily cost in reception centre per asylum seeker=based on actual costs divided by the number of asylum seekers, by reception centre. Does not separate rejected applicants (nor applicants from non-ODA countries), although they haven't been reported in the totals.
- Average annual cost per refugee in municipalities=total actual costs divided by the number of refugees moved to the municipalities, incl. quota refugees. Different types of refugees are not separated in the calculations.

How do you assess the share of rejected asylum seekers: based on real data, estimates, well founded expectations? Based on first instance or final rejection?

The ODA figures reported are based on actual numbers of rejected and accepted asylum seekers. Estimates are only used in forward-looking figures. Repeat applicants are not separated in the calculations, so the same cost items are calculated for all applicants.

Provide data on the number of refugees and per capita costs (included in ODA), the average time to get a decision on status, the average time on support, the share of rejected asylum seekers.

- The number of refugees and per capita costs in 2017
 - ODA eligible approved applications: 3743
 - Quota refugees: 750
 - Total: 3743+750=4493
 - Total ODA: 48,262 mill. EUR
 - ODA per refugee= 48,262 MEUR / 4493 = 10 742 EUR
- The average time to get a decision on the status: 244 days (October 2019).
- The average time on support: As Finland has reported only those applicants who have been accepted, plus quota refugees, they are in effect 365 days on some form of support. In reception centres, the average waiting time before transferring to municipalities is 2 months, so the total time in reception centres is about 300 days.

ODA costs in 2017

i) Temporary sustenance

Costs for recognised refugees (reception centres): 54 198 341 €

Costs for rejected applicants (*not reported in 2017*): 55 921 451 €

Sustenance of refugees in municipalities 8 667 750 €

Training Pre-school, 2017 estimate, not reported as ODA so far: 10 260 000 €

Language support: Language etc training in municipalities: 2 900 700 €

ii) Voluntary repatriation: Flights, Incl. all expenses related to voluntary repatriation: 1 502 900 €

iii) Transport to host country, quota refugees entering country: 1 414 036 €

iv) Rescue at sea. *Not applicable*

v) Administrative costs. *Not reported*

Total ODA = EUR 68 683 727

Data used in the calculation:

Asylum seekers, number of applications received: 5 059

- of which, subsequent applications (included in the reported ODA figure): 1 845

Positive decisions (asylum, secondary protection, other): 3 784

- of which, number of ODA-eligible decisions (98.92 % from ODA-eligible countries of origin): 3 743

Negative decisions: 3 996

- of which, number of ODA-eligible decisions (96.65 % from ODA-eligible countries of origin): 3 862

Expenses per day in reception centre: 41 €

Application processing time in reception centre, days: 357

Quota refugees: 750

Annual expenses per quota refugee (in municipalities): 11 828 €

Annual per capita training expenses in municipalities (50 % of total expenses are ODA eligible): 5 305 €

Amount reported as ODA is 100 % for adult quota refugees, and asylum seekers 12 months - time spent in reception centre

Currently not reported, but from 2019 onwards:

Monthly expenses per pupil in instruction preparing for basic education for immigrants: 1 200 €

Number of pupils (asylum seekers, family reunification) entering the education annually, estimate: 950

Months spent in preparatory instruction in the first 12 months: 9

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IN-DONOR REFUGEE COSTS IN ODA