

REPORT

Article 22 of the Constitution of the International Labour Organisation

Report for the period 1 June 2018 to 31 May 2025

made by the Government of Finland

on the **DOMESTIC WORKERS CONVENTION, 2011 (No. 189)**

(ratification registered on 8 January 2015)

Direct Request, 2022

Article 4:

In Finland, the Employment Contracts Act (55/2001) and other general labour legislation applies to all domestic labour. Specific provisions concerning young workers are laid down in the Young Workers' Act (998/1993), the Government Decree on Work that is Especially Harmful and Dangerous to Young Workers (475/2006), the Ministry of Social Affairs and Health Decree on a Non-Exhaustive List of Light Work Tasks Suitable to Young Workers (188/2012) and the Ministry of Social Affairs and Health Decree on a Non-Exhaustive List of Work Tasks Dangerous to Young Workers (189/2012).

Young Workers' Act (998/1993) in English:

<https://www.finlex.fi/api/media/statute-foreign-language-translation/296896/mainPdf/main.pdf?timestamp=1993-11-19T00%3A00%3A00.000Z>

A 'young person' means a person under the age of 18. Under section 2 of the Young Workers' Act, a person who has reached the age of 15 and who has completed the basic education syllabus may be admitted to work. Furthermore, a person may be admitted to work if the person has reached the age of 14 or will reach that age in the course of the calendar year, and if the work in question consists of light work that is not hazardous to the person's health or development and does not hinder school attendance, for at most half of the school holidays and temporarily during schoolwork or otherwise, for individual work performances of a short duration. Provisions on regular working hours are laid down in section 4. During the school year, the daily working hours of an employee who is required to attend the basic education syllabus as laid down in the Basic Education Act cannot exceed seven hours on days when there is no school and two hours on school days. The total length of the school day and working hours cannot, however, exceed eight hours or the weekly working hours 12 hours. The working hours of a person under the age of 15 shall not exceed seven hours a day and 35 hours a week during the school holidays.

Under section 9 of the Act, the employer shall see to it that the work is not hazardous to the physical or mental development of a young worker, and that it does not require more exertion or

responsibility than can be considered reasonable with respect to the young worker's age and strength. A young worker may only carry out work which does not cause a special accident risk or a health hazard or which is not hazardous to the young worker or others.

Under the provisions, a young worker may, for example, work in the evenings as a babysitter in the home of the child being looked after or perform some other light domestic work. The work does not prevent the young person's school attendance since the working hours of a young person attending basic education may be a maximum of two hours on school days and persons under the age of 15 may only work temporarily during schoolwork. Work performed in a home is typically not particularly dangerous and, in the event that it is, a young worker may not be hired for the work.

Article 5:

Where necessary, the OSH Divisions of Regional State Administrative Agencies provide guidance and advice to all employees, including domestic workers. If a domestic worker reports issues such as exploitation or harassment in their workplace, an OSH inspection may be carried out there. The worker may receive guidelines from the OSH authorities on how to act in various problem situations. The OSH authorities have comprehensive websites in English, and advice over the phone is also available in English.

OSH website in English: <https://tyosuojelu.fi/en/home>

Article 13:

Under section 8 of the Occupational Safety and Health Act (738/2002), employers have a duty to take care of the safety and health of their employees while at work by taking the necessary measures. For this purpose, employers shall consider the circumstances related to the work, working conditions and other aspects of the working environment as well as the employees' personal abilities. Employers shall, in particular, take into consideration that the employees' personal abilities may require individual occupational safety and health measures to ensure the employees' safety and health. Under section 10 of the Act, employers shall, taking the nature of the work and activities into account, systematically and adequately analyse and identify the risk factors and hazards caused by the work, the working hours, the workspaces, other aspects of the working environment and the working conditions and, if the risk factors and hazards cannot be eliminated, assess their consequences to the employees' safety and health.

Under the said provisions of the Act, the employers of domestic workers have the duty, taking account of the special characteristics of the work, to ensure that the work of domestic workers is safe and healthy. Although there are no specific provisions concerning domestic labour in particular, the obligations described above belong to the employer's key obligations in terms of OSH. If an employer violates OSH provisions, the employer may be convicted for an occupational safety and health offence.

As regards the direct request of the Committee of Experts concerning Article 14, the Government notes that domestic workers who are in a contractual employment relationship in Finland are in the same position in terms of social security as other wage and salary earners and the same general rules concerning social security apply to them.

Social security legislation based on residence has been reformed with legislative amendments that entered into force on 1 April 2019 (Government Proposal HE 188/2018). The objective of the reform was to clarify the legislation with regard to residence-based social security benefits. The Act on Residence-Based Social Security in Cross-Border Situations (16/2019) lays down provisions on the conditions under which persons coming to Finland from abroad have the right to residence-based benefits. Eligibility for residence-based benefits can be based either on residence in Finland or on employment. An employee coming to Finland has the right to benefits for the duration of their employment when their minimum pay is EUR 800.02 per month at the 2025 level. In addition, the benefit-specific conditions laid down in each benefit act must be met. Regulations 883/2004 and 987/2009 of the EU on the coordination of social security systems apply to those moving to Finland from a country applying EU law.

Domestic workers have the right to residence-based social security and public healthcare services under the same conditions as others employed or permanently residing in Finland. Domestic workers therefore also have equal rights to protection and benefits during pregnancy. Already before the child is born, the birthing parent can take pregnancy leave for the duration of which pregnancy allowance is paid. If the working conditions are harmful to pregnancy and the employee has to stay off work before going on pregnancy leave, the person may apply for special pregnancy allowance. Pregnancy allowance is part of the whole formed by the parental allowance system. The employer, in this case a household, must take out earnings-related pension insurance for a domestic worker when the minimum income boundary laid down is exceeded. The earnings-related pension insurance is statutory, that is, compulsory, and the employee's earnings-related pension security is arranged by means of the insurance. Insurance is required for a contractual employment relationship if the employee is aged 17–67 and paid more than EUR 70.08 per month at the 2025 level. A household employer is obligated to take out accident and occupational disease insurance for their employee if the minimum euro limit set for the insurance obligation for the calendar year is exceeded. The insurance obligation limit, which is EUR 1,500 in 2025, is specific to employer and calendar year. A household that must take out statutory accident insurance for an employee is, as a general rule, also obligated to pay the domestic worker's unemployment insurance contribution. In addition, a household has to arrange occupational health care for the employees it has hired.

The Tax Administration and the social security insurance institutions concerned have comprehensive guidelines on employer obligations relating to domestic work and guidelines for employees and persons residing in Finland on social security benefits and how to apply for them. A key multilingual communication channel targeted at those moving to Finland or already residing in Finland is the [Info Finland](#) service, which brings together extensive information about Finland and topics relating to the various authorities.

Article 17:

Finnish OSH enforcement has covered domestic labour to some extent in recent years. All inspections targeted at the field have taken place in Southern Finland and, in practice, more specifically very largely within the Greater Helsinki area. Except for one exception, all of the inspections related to the enforcement of the use of foreign labour, and information received from other authorities (such as the Finnish Immigration Service) was utilised in their targeting.

During the reporting period, the first inspections in the industry in question only commenced in 2020. Of these, around 80% of the enforcement concerning foreign nationals in Southern Finland were extensive inspections in terms of their list of items, also covering compliance with minimum terms of employment.

Data from the OSH authorities' enforcement database (Vera) has been collected on inspections carried out in the period from 1 June 2018 to 31 December 2024. In industrial category '97000 Activities of households as employers of domestic personnel', a total of 52 inspections were carried out during that period. There were no inspections in this industry in 2018 or 2019. In 2020–2024, inspections took place as follows:

- 2020: 2 inspections
- 2021: 15 inspections
- 2022: 20 inspections
- 2023: 5 inspections (one of which was an inspection of so-called domestic supervision of employment relationships)
- 2024: 10 inspections

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Nothing new to report.

A copy of this report has been sent to following labour market organizations:

1. The Confederation of Finnish Industries (EK)
2. The Central Organization of Finnish Trade Unions (SAK)
3. The Finnish Confederation of Salaried Employees (STTK)
4. The Confederation of Unions for Academic Professionals in Finland (Akava)
5. The Commission for Local Authority Employers (KT)
6. The State Employer's Office (VTML)
7. The Federation of Finnish Enterprises (SY)
8. The Commission for Church Employers

Statements of the labour market organisations:

The Central Organisation of Finnish Trade Unions (SAK), the Confederation of Unions for Professional and Managerial Staff in Finland (Akava) and the Finnish Confederation of Professionals (STTK) comment as follows:

The ILO Convention on decent work for domestic workers was ratified and entered into force for Finland on 8 January 2016. In that context, the Act on the Employment of Household Workers was repealed. Domestic workers were, in the manner required by the Convention, brought within the scope of the same provisions of labour law and the same level of protection under labour law as generally applied to employees. It was difficult to estimate the number of domestic workers in Finland when the ratification of the Convention was prepared. It could, however, be assumed that domestic work would become increasingly common in Finland, too, in the future. Among other

things, this trend may be affected by issues including increasing immigration. The central organisations of wage and salary earners emphasised that, considering the special nature of domestic work, particular attention must be paid to the OSH level of the workers and to related enforcement.

Report on exploitation of workers in domestic work

Internationally, domestic work, that is, paid cleaning and care work taking place in homes, is one of the fastest-growing industries and employs millions of people in Europe. Nevertheless, this work often remains invisible. In the name of neoliberal fiscal austerity, efforts have been made to reduce the public sector's share of and responsibility for care in the Global North as well as South, which is why care is moving increasingly from institutions to homes. Care and cleaning work moving into homes creates global mobilities in pursuit of work.

Domestic work has been examined as part of a broader report based on data collected in three partner countries – Estonia, Finland and Latvia – as well as in Poland and Ukraine on the modus operandi and routes of traffickers and other actors involved in human trafficking, and on trends in trafficking. (HEUNI Report Series no. 103a Helsinki 2023 <https://heuni.fi/-/report-series-103-patterns-of-exploitation-elect-thb#ad53ce9dhttps://heuni.fi/-/report-series-103-patterns-of-exploitation-elect-thb#ad53ce9d>)

According to the report, exploitation in domestic work or domestic servitude is a form of human trafficking which is extremely difficult to detect because the work is performed in private households. In many countries, domestic work is often part of the informal economy. The fact that the work takes place out of sight isolates the workers and makes them – usually women – more vulnerable to abuse and exploitation than other workers.

According to the report, the situation of exploitation in the domestic work sector varies in the five countries mapped and there is a general lack of information regarding this form of labour exploitation.

Finnish labour (OSH) inspectors have pointed out that potential exploitation in this sector has gone largely unnoticed in Finland, also compared to other European countries. The majority of the inspections are document-based, since the inspectors are not allowed to enter into domestic premises unless there is reason to suspect that the worker's life or health is in danger and the monitoring cannot be conducted in any other way (Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006). According to the OSH inspectors interviewed, the inspection processes are rendered more difficult also by the fact that it is not easy to get into contact with or reach employees in this sector. These employees may not be aware of the rights they have as workers and hence may not themselves come forward and report potential problems or abuse. However, the inspections carried out so far have revealed problems in the cleaning sector and also a few cases of more severe exploitation in domestic care work.

Observations of OSH authorities

According to a media release of the OSH authorities, there are serious shortcomings in the working hours issues of foreigners doing domestic work (7 March 2022, in Finnish <https://tyosuojelu.fi/-/kodeissa-tyoskentelevien-ulkomaalaisten-tyoaika-asioissa-vakavia-puutteita>)

Enforcement carried out by the OSH authorities revealed that more than half of the households inspected had fully neglected the preparation of a shift roster. The employer had not informed the employee in writing of the start and end times of their shifts and the timing of their lunch break. One in three had failed to keep records of working hours or the records were significantly insufficient, which made it difficult to establish the actual pay. The amount of overtime work was also difficult to assess due to shortcomings in the working hours records. In some cases, compensation for overtime with money or time off had also been fully neglected or compensation had only been provided in part.

Enforcement carried out by the OSH authorities also revealed two cases of serious labour exploitation. In one of these, the employee had been considerably underpaid for a long period. In addition, the employee had been made to do a lot of overtime, Sunday and evening work without receiving the appropriate premiums. In the other case, the person had not received any pay at all. Neither of the employers had drawn up records of working hours.

The enforcement also revealed that some employees worked in so-called household or cleaning rings where multiple households had hired the same foreign employee. This mainly involved cleaning work. According to the OSH authorities, not all of those hiring a domestic worker had understood that they had been in an employer role. They had therefore not entered into an employment contract with the worker nor taken care of their other obligations as an employer, such as organising occupational healthcare.

Research on domestic labour

Domestic labour is also analysed in the following article: Mesiäislehto, M., Näre, L. & Wide, E. (2022). Kotitaloustyön poliittinen talous ja moninaisen eriarvoisuuden muodot [Political economy of domestic labour and forms of diverse inequality]. *Poliittinen talous*, 10(1), 73–108. <file:///C:/temp/112485-Artikkelin%20teksti-243402-3-10-20220919.pdf>. The article analyses paid domestic labour and related inequality in Finland.

The qualitative analysis of the article brings up how inequality in domestic labour manifests particularly through terms and conditions of employment, the nature of the work and the legal position of foreign workers. Domestic workers employed by households are often in a vulnerable position since their employment terms, tasks and working hours are largely determined by the employer's needs. For foreign workers, the dependence on the employer is particularly emphasised as the fear of losing their job and their residence permit restricts their opportunities to negotiate on their employment terms. The special position of au pairs is also related to this: they are not legally recognised as employees, which leaves them fully excluded from the protection associated with contractual employment relationships.

The special nature of domestic labour – work that takes place in a private home and is often informal – blurs the boundaries between work and leisure time. The negotiating position of the

workers is poor, particularly when they live in their employer's home. Refusing work is difficult in practice, which increases the day-to-day workload and the degree of subordination involved in the work.

In addition, the vulnerability related to domestic labour is also strengthened by the practices of the Finnish migration policy. Residence permits of workers arriving from non-EU countries are often conditional on an existing contractual employment relationship, which ties them to the employer in many ways. Employers become not only those determining the employment terms but also those guaranteeing the workers' legal residence and conditions of life. For example, the income limits for family unification may force foreign workers to have multiple jobs at the same time without any real opportunity for living their own life or doing restful everyday things. For asylum seekers, losing their job may at worst result in the withdrawal of their residence permit and their return to their original — potentially dangerous — country of origin.

Observations on domestic labour and work performed in another person's home

Acting as a personal assistant of a person with a disability is based on the Disability Services Act. There are at least 40,000 personal assistants working in Finland. This is one of the largest occupational groups in the health and social services sector in terms of number, but due to the nature of the work, it often not visible in statistics on the sector or in solutions concerning enforcement.

Personal assistance is work usually carried out alone in the home of another person. A significant part of personal assistance, in addition, is performed using the so-called employer model whereby the person with a disability themselves or their representative acts as the employer of the personal assistant. This is how at least 20,000 personal assistants are employed in Finland. Assistants are also employed increasingly by private service providers. The public sector provides only a very small share of personal assistance.

The Act on the Supervision of Healthcare and Social Welfare (741/2023) does not apply when the service provider provides services referred to in section 14, subsection 2 of the Social Welfare Act (1301/2014), to informal care referred to in the Act on Support for Informal Care (937/2005) nor to family care under an assignment contract referred to in the Family Care Act (263/2015). The Act on the Supervision of Healthcare and Social Welfare does also not apply to a person acting in accordance with the employer model for personal assistance referred to in section 11 of the Disability Services Act (675/2023) except for section 28 and section 32, subsection 2 of this Act. Under section 28 of the Act on the Supervision of Healthcare and Social Welfare, an employer acting under the employer model or a private service provider may require that a person working as an assistant submits an extract from the criminal records. Section 32 of the Act in turn enables supervision by the supervisory authority relating to section 28.

By contrast, any supervision to protect the worker in working conditions located in another person's home remains, in practice, outside the scope of the Act. The OSH authorities or legislation concerning service provision do not sufficiently safeguard the working conditions of personal assistants working in another person's home.

The central organisations of wage and salary earners maintain that, with regard to OSH in work taking place in another person's home, there should be better opportunities for OSH enforcement that is carried out in particular to protect the worker. Opportunities for the safe performance of tasks should be ensured by means of sufficient induction, guidance, occupational upskilling and assistive products. This is particularly important considering that the disability services legislation enables, for example, the implementation of even demanding care duties such as the administration of medicine, wound care, catheterisation and ventilator use through personal assistance that does not involve qualifications requirements. The workers are, however, left alone in their work with their physical and mental workload.

Forms of contractual employment relationship in domestic cleaning

There is no precise estimate of the number of domestic cleaners within the scope of application of the Collective Agreement in the Facility Services Sector. It has been found jointly with the employers' association that there are around 80,000 employees working in the facility services sector. We estimate that around 70% of these work in cleaning and 30% in real estate maintenance. A small share of cleaning personnel work in domestic cleaning. Examples of their typical job titles include domestic cleaner and domestic helper. Facility services sector employees also work under the title of care helper when the majority of their work is cleaning work instead of care work and the employer's principal activity is real estate services.

Domestic cleaners also work in so-called cleaning rings. In these, the employer is typically a group of households in which each household offers the cleaner an agreed amount or a least an agreed amount of employment. In these cases, each household has the responsibilities and obligations of the employer, and it should be noted that, for example, the employee must be provided with a shift roster in accordance with the collective agreement, the employee's form of working hours must be determined, and the other minimum terms and conditions determined by the collective agreement with regard to matters such as pay must also be complied with. Problems relating to the phenomenon are described under the subsection concerning the OSH authorities' observations.

Unfortunately, there is no data on the number of self-employed persons or employees incorrectly classified as self-employed in domestic cleaning, and it is not possible to estimate the number either. It is, however, known that employees work in domestic cleaning through a variety of platforms. It can be estimated that the number of people doing platform-mediated work will increase in the future and the aim of platform enterprises is for work to be carried out under a contractual relationship other than an employment contract so that they can avoid employer obligations in that way.

Labour exploitation in the domestic cleaning sector

Labour exploitation occurs very extensively in the domestic cleaning sector. It is challenging and even problematic to address cases of exploitation in domestic cleaning, as exploitation taking place behind the closed doors of a home is naturally difficult to detect and identify let alone to intervene in. As is known, workers with an immigrant background are particularly vulnerable to being exploited in their employment relationships since they often lack sufficient understanding of

the functioning of the labour market, terms and conditions of contractual employment relationships and employees' rights.

Working conditions in domestic cleaning

Working conditions in domestic cleaning are highly varied and diverse. People in very different life situations purchase cleaning services for their home. The working conditions vary extensively depending on the size of the premises being cleaned, the arrangements and the equipment used. It is known that those working through platform enterprises in part have access to work equipment provided by the platform company, but not everyone does, which is when they work using the customer's equipment.

Cleaning work overall is physically strenuous, and domestic cleaning can be regarded as more strenuous in terms of its conditions than, for example, maintenance cleaning taking place in an office. Domestic cleaning involves a lot of reaching, crouching and repetitive postures that make the workload heavy. Domestic cleaning may also feature threatening situations, as the cleaner often works alone and may encounter unexpected and even threatening situations, including threat of violence, when working in the customer's home.