

# Supervision of the use of foreign labour in 2025

Report

# Summary

In 2025, the occupational safety and health (OSH) authority continued its active supervision of companies using foreign labour, conducting 1,817 inspections.

A key aspect to enforce when supervising the use of foreign labour is that foreign workers have the right to work in Finland. Extensive inspections supervise not only the right to work but also employer compliance with labour law and universally binding collective agreements. In 2025, approximately half of the inspections carried out were extensive inspections.

Supervisory findings were similar to previous years.

Approximately one in ten inspections concerning the right to work found at least one foreign employee who did not have the right to perform the work in Finland.

There continued to be many deficiencies in compliance with the minimum terms of employment. Deficiencies in pay practices were identified in approximately 40 per cent of inspections that addressed the issue. Numerous deficiencies were also found in the records of working hours. More than half of the inspections found that the record of working hours had not been kept in the manner required by law or was missing altogether. When employers failed to keep accurate records of working hours, it was not always possible to verify the accuracy of pay.

This report presents more detailed sector-specific supervision findings from the hotel and restaurant sector, the construction sector, seasonal work and manufacturing. In addition, the report covers other sectors known to employ a

large number of foreign workers: trade, transportation, beauty care, cleaning, temporary staffing, and car washes and car repair shops.

The following phenomena were particularly evident in supervision in 2025: the disguising of employment relationships as self-employment, the vulnerable position of students from third countries, and employers' attempts to circumvent obligations by falsely classifying employees as posted workers.

Inspections uncovered numerous cases in which employment relationships were disguised as self-employment or what is referred to as "light entrepreneurship". Occasionally, employment relationships were changed to commission agreements with terms similar to those of an employment contract, sometimes without the employee even understanding the difference.

If a person's employment relationship is disguised as self-employment, they are excluded from the protections provided by labour laws, including those related to remuneration, insurance, and the Occupational Safety and Health Act. This practice was previously mainly found in the construction and service sectors, but there are now signs it has spread to other fields such as logistics, cleaning, and beauty care.

Data from other authorities was used in most of the inspections. Although the occupational safety and health authority's right of access to information has improved in recent years, there is still room for improvement in this area. This is why it is important to actively promote the Government Programme entry on the development of information exchange between authorities.

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# 1. Overview of supervision in 2025

The OSH authority ensures that employers and contractors operating in Finland comply with their statutory obligations regarding the use of foreign labour. The supervision aims to guarantee an equal and fair labour market for all and an even playing field for companies.

In 2025, the OSH authority carried out more than 1,800 inspections of companies using foreign labour in Finland. The information in this report was compiled in January and February 2026, at which time slightly over 40 of the inspections started in 2025 were still unfinished. The information in this report is based on the completed inspections.

About 440 of the inspections were carried out together with other authorities. The number of joint inspections with other authorities was slightly lower than in the previous two years.

In addition to Finnish authorities, cooperation also took place at the international level. For example, the OSH authority was involved in the Empact joint action weeks organised by Euro-pol and has further intensified cooperation and information exchange, especially with the OSH authorities of Estonia and the other Baltic countries.

The majority of inspections were carried out at companies domiciled in Finland. Foreign companies domiciled in other EU countries but operating in Finland were also inspected. The employer obligations of such companies are the same as for companies registered in Finland.

In addition, supervision was aimed at foreign companies that post workers to Finland and at the clients of these companies. This report does not address supervisory findings related to the posting of workers. These are discussed in the report titled *Enforcement of the posting of workers and notifications of posting in 2025* (the report is available at [tyosuojelu.fi/raportit](https://tyosuojelu.fi/raportit)).

There are several types of inspections in the supervision of the use of foreign labour. As in

## From Regional State Administrative Agencies to the Finnish Supervisory Agency

The OSH authority operates as an independent supervisory authority. Until the end of 2025, the OSH Divisions in five Regional State Administrative Agencies operated as independent regional OSH authorities. The Regional State Administrative Agencies were abolished on 31 December 2025, and the new national Finnish Supervisory Agency started operating on 1 January 2026. The Occupational Safety and Health Department at the Finnish Supervisory Agency serves as the national OSH authority, and supervision continues throughout Finland.

previous years, both limited and extensive inspections were carried out in 2025:

- **The limited inspections** focused primarily on verifying the right to work and gathering comparative data for inspections concerning minimum employment terms. These inspections were carried out at various locations, such as construction sites, shipyards, and cleaning sites, and often involved employee interviews. Limited inspections were also carried out to follow up on individual obligations issued in previous inspections.
- In addition to the right to work, **extensive inspections** supervised the minimum terms of employment, such as pay, non-discrimination compliance, and keeping records of working hours. Extensive inspections also supervised other employer obligations, such as key terms of employment, accident insurance and the provision of occupational health care.

Approximately 70 inspections used an interpreter to interview employees and employers. Employees who do not speak Finnish or Swedish are associated with an increased risk of occupational exploitation or, at its most serious, human trafficking. Interpretation safeguards the right of any potential victim to receive help from the authorities.

The majority of the inspections on the use of foreign labour are carried out without prior notice. Inspections without prior notice are often the only way to get reliable information about a company's employees. Inspections are carried out both on-site at workplaces and on the basis of documents.

When an OSH inspector identifies deficiencies that constitute non-compliance with laws and regulations during an inspection, they impose obligations, which are either written advice or improvement notices. If this deficiency is isolated or minor, the inspector will issue written advice to remedy it. For example, written advice can be issued when not all of an employee's hours have been recorded in the working time records.

If the deficiency is greater than minor, the inspector will issue an improvement notice. An improvement notice is issued, for example, when no record of working hours has been kept at all, or when the records are so incomplete that they do not reflect the actual hours worked by an employee.

An OSH inspector can issue written advice on all matters that are supervised by the OSH authority. However, an improvement notice and any binding decision following it can only be issued in certain matters laid down by law. For example, improvement notices may be issued regarding the verification of the right to work.

If the violation is repeated or the harm or hazard is clearly greater than minor, the OSH authority will assess whether the act may constitute a criminal offence and whether filing a criminal complaint should be considered.

## 1.1 Targeting the supervision and number of inspections

The OSH authority targets its enforcement activities using a risk-based approach. Enforcement is mainly carried out at sites where deficiencies are likely to be encountered, especially in the minimum terms of employment and verifying the right to work. This should be taken into account when the results of supervision are examined. The inspection findings are unlikely to fully reflect the

situation of foreign employees or compliance with minimum employment terms in Finland; rather, the inspections tend to highlight deficiencies.

The OSH authority's extensive rights of access to information are utilised to target enforcement efforts. Tips are important in targeting enforcement, and most of them are received from the authorities involved in the processing of foreign employees' residence permits. Many tips also come from other authorities, employee organisations in various sectors, third-sector actors and citizens. In addition, enforcement targets are selected in close cooperation with other authorities.

This report examines the findings of extensive inspections regarding the use of foreign labour in ten sectors that were targeted for the highest number of inspections in 2025 based on their level of risk.

The goal of the OSH authority is to ensure equal terms of employment for all workers. From this perspective, a key aspect of supervising the use of foreign labour is knowing how employers comply with their obligations to ensure that minimum employment terms are met and verify that workers have the right to work.

In 2025, the use of foreign labour was supervised through 1,817 inspections, of which 1,775 were completed at the time the data in this report were collected. The information in this report is based on the completed inspections. Of these completed inspections, 34% were carried out in the hotel and restaurant sector, 22% in the construction sector, 9% in seasonal work and 8% in manufacturing. A total of 21% of the inspections were carried out in other sectors covered in this report (trade, transportation, beauty care, cleaning services, temporary staffing, and car washes and car repair shops). The remaining 7% of inspections were spread across several different sectors.

Compared to last year, the number of inspections in the hotel and restaurant sector decreased by four per cent and increased by the same amount in the construction sector. Otherwise, inspections were conducted across sectors in almost the same proportion as in the previous year.

## 2. Phenomena observed in supervision

Supervision findings indicate that foreign workers face an increased risk of various forms of exploitation, partly due to insufficient language skills.

The following phenomena were particularly evident in supervision in 2025: the disguising of employment relationships as self-employment, the vulnerable position of students from third countries in the labour market, and employers' attempts to circumvent obligations by falsely classifying employees as posted workers.

### 2.1 Employee or self-employed?

Inspections occasionally reveal that a foreign individual appears to be in an employment relationship with an employer, even though the employer claims no such relationship exists. Such situations arise, for example, in restaurants, where a person working claims to be merely helping out or, more commonly, says they are completing a short-term unpaid internship, after which the employer will hire them as a regular employee. However, unpaid internships are not recognised in Finland, with the exception of work placements organised by educational institutions and municipalities; work must always be compensated.

As in previous years, there were numerous cases in 2025 that gave rise to suspicions that an employment relationship was being disguised as self-employment. The employment relationship was often presented as light entrepreneurship. In terms of labour law, a person who performs work in exchange for payment is always either an entrepreneur or an employee, and the status of what is referred to as a "light entrepreneur" does not differ from that of other entrepreneurs.

In the supervision of the use of foreign labour, cases often involved situations where either the employment relationship had been converted into a commission relationship – sometimes even wit-

Supervision revealed numerous cases that gave rise to suspicions that an employment relationship was being disguised as self-employment. This phenomenon has become more widespread and is particularly evident in the construction sector.

hout the employee's knowledge – or a commission agreement had been entered into directly with the worker, the terms of which nevertheless resembled those of an employment contract. For example, inspections revealed cases where a person hired as an entrepreneur was performing standard restaurant work that met the criteria for an employment relationship at a rate of €12/hour plus VAT.

If a person's employment relationship is disguised as self-employment, they are excluded from the protections provided by labour laws, not only with regard to compensation but also to insurance and the Occupational Safety and Health Act. In many cases, the compensation received for the work was lower than the pay that would have applied under the collective agreement.

Supervision findings indicate that foreign workers face an increased risk of their employment relationship being disguised as self-employment, for example, because of poor language skills. Based on the findings, bogus and forced self-employment has become part of labour exploitation.

The OSH authority only supervises work carried out in employment relationships, so in unclear cases, the inspector must assess whether an employment relationship exists. In supervision, this is assessed based on the characteristics of employment set out in the Employment Contracts Act. In 2025, the nature of the legal relationship between employment and entrepreneurship was assessed for 325 persons in 69 inspections.

Disguising an employment relationship as self-employment has become more common, and the phenomenon is especially evident in the construction sector. The legal status of workers has also had to be assessed in other sectors, such as manufacturing, logistics, beauty care and restaurants.

If an inspector determines that work was carried out in an employment relationship, the employer may be issued an improvement notice regarding matters such as pay, keeping records of working hours and the provision of payslips. It is possible to escalate an improvement notice to a binding administrative decision, in which case an employer is obligated to comply with the improvement notice under threat of a conditional fine. The employer has the right to appeal the decision to the Administrative Court.

## 2.2 Students in vulnerable circumstances

In recent years, the number of students coming to Finland from third countries has increased significantly. According to statistics from the European Migration Network's *Key Figures on Immigration*, in 2020, the Finnish Immigration Service granted 3,225 initial residence permits for studies. In 2023 and 2024, more than 12,000 initial residence permits were granted to students each year, and in 2025, over 10,000.

Students from third countries are also represented in the labour market, for example, in the restaurant, cleaning and beauty care sectors. These students' Finnish language skills are practically non-existent, and, based on the inspection findings, some also have very poor English skills.

From the OSH authority's perspective, students are in a vulnerable position in the labour market in part because their knowledge of Finnish employment practices is limited. In addition, there are

Students arriving from third countries are in a vulnerable position in the labour market in part because their knowledge of Finnish employment practices is limited.

indications that many students do not have the financial resources to live in Finland. Many have also received inaccurate information about employment and earning potential in Finland.

In some cases, it also appears that admission to an educational institution is used to enter the country, even though the actual purpose of entry is something other than study.

## 2.3 Genuine posting or not?

Enforcement activities have revealed that foreign companies operating in Finland report their employees as being posted from abroad, even though the companies actually operate solely in Finland.

In 2025, 12 cases were investigated in more detail to determine whether the situation involved posted workers under the Act on Posting Workers. In seven cases, the inspector concluded that the situation did not constitute a posting, while in four cases it did. In one case, the inspector found that the company employed both posted and directly hired employees in Finland.

These activities are motivated by a desire to evade taxes and avoid employer obligations. This issue has also gained increasing attention among EU Member States.

### 3. Supervision findings by sector

Based on previous inspections and other available information, high-risk areas have been identified in the supervision of the use of foreign labour. This report discusses the results and findings of supervision in these sectors.

In 2025, enforcement activity was mostly carried out in the hotel and restaurant sector, the construction sector, seasonal work and manufacturing. The next most supervised sectors were trade, transportation, beauty care, cleaning, temporary staffing, and car washes and car repair shops.

These ten sectors examined in this report are the so-called “high-risk sectors” for the supervision of the use of foreign labour. The last six of these sectors are referred to in the report as “other high-risk sectors.”

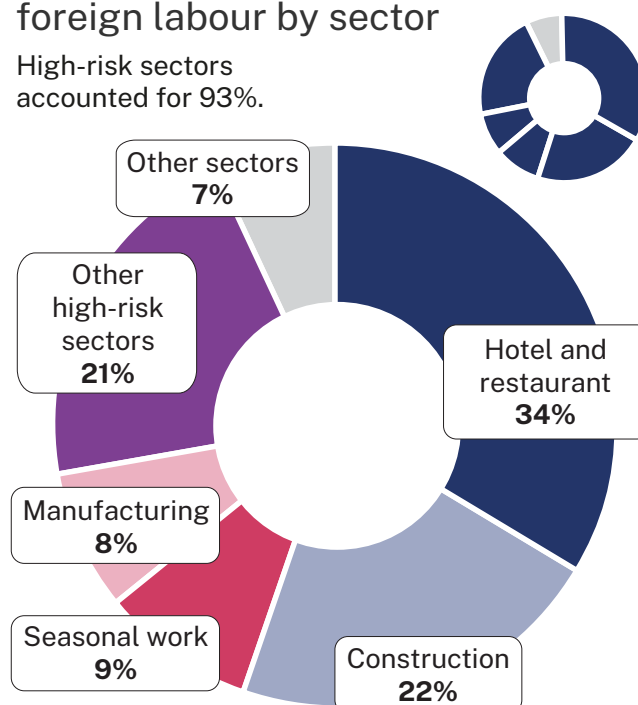
More than 100 inspections were conducted in each of the four most heavily supervised high-risk sectors. A total of 597 inspections were carried out in the hotel and restaurant sector, accounting for more than one-third of all inspections for the supervision of the use of foreign labour.

A total of 369 inspections were carried out in the next six most heavily supervised high-risk sectors. In these sectors, the number of inspections remained below 100 per sector; the lowest number of inspections was carried out in car washes and car repair shops (28 inspections).

In addition, 126 inspections were carried out across many different sectors. Inspection rates in these sectors are so low that it is not appropriate to draw sector-specific conclusions from them.

#### Supervision of the use of foreign labour by sector

High-risk sectors accounted for 93%.



**Figure 1.** Breakdown of the supervision of the use of foreign labour by sector in 2025. 93% of enforcement activities were targeted at high-risk sectors.

Supervision focused on sectors with large numbers of foreign workers where deficiencies were likely to occur, particularly in the minimum terms of employment and the verification of the right to work.

The report examines the numbers of obligations (written advice and improvement notices) imposed through extensive inspections of high-risk sectors. In 2025, approximately half of the inspections carried out were extensive inspections.

The supervision results are evaluated in terms of four key areas subject to supervision in the use of foreign labour:

- Pay in accordance with a generally binding collective agreement (referred to as “pay” in the tables and charts)
- Non-discrimination compliance
- Record of working hours
- Verification of foreign employees’ right to work

The first three of these are the key minimum terms of employment that must be enforced when supervising the use of foreign labour.

The report examines the extent to which obligations (written advice and improvement notices) have been imposed on employers in high-risk sectors on key enforcement matters. The relative proportions of the obligations imposed were calculated to examine what percentage of inspections in each sector resulted in obligations. This makes it possible to compare sectors with each other, although the number of inspections varies considerably between sectors. (Figure 2)

Averages have also been calculated across all the high-risk sectors based on the obligations imposed for key enforcement matters. The supervisory findings for each sector are assessed in relation to these averages. For the four most heavily supervised sectors, the analysis also examines what proportion of the identified pay deficiencies may be related to discrimination.

Based on the inspections carried out in high-risk sectors, it can be concluded that deficiencies related to pay and records of working hours stand out clearly compared to other supervised matters.

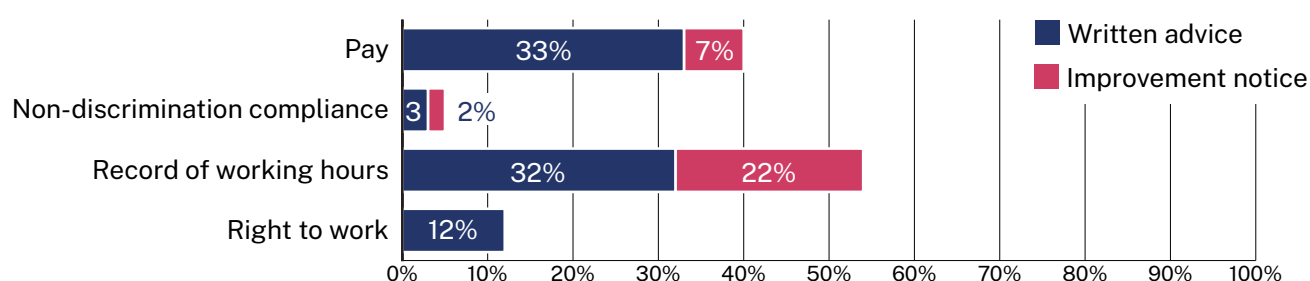
Pay deficiencies were found in 40% of inspections in high-risk sectors. Deficiencies in keeping records of working hours were found even more frequently (in 55% of inspections). The findings suggest that there are significant challenges in the fulfilment of these key minimum terms of employment in high-risk sectors.

Deficiencies in verifying the right to work were found in 12% of inspections.

There were relatively few findings regarding non-discrimination compliance. This may indicate either that there are fewer cases of discrimination-related deficiencies or that they are more challenging to identify through inspections than other deficiencies.

## Imposed obligations relating to minimum terms of employment and the duty to verify the right to work in inspections of high-risk sectors

The share of inspections leading to obligations out of all extensive inspections conducted in high-risk sectors.



**Figure 2.** Obligations regarding the minimum terms of employment and the duty to verify the right to work in inspections of high-risk sectors: the share of inspections resulting in obligations out of all extensive inspections conducted in high-risk sectors.

### 3.1 Comparison by sector

For each high-risk sector, the average number of obligations imposed for key enforcement matters during a single extensive inspection was also calculated. The number of imposed obligations has been expressed as a ratio of the number of inspections conducted in each sector. The resulting key figure describes the average number of obligations per inspection. For example, 109 extensive inspections were carried out in the construction sector, which resulted in a total of 154 obligations concerning key enforcement matters, i.e. an average of 1.41 obligations per inspection.

Figure 3 shows the average number of obligations per inspection in the high-risk sectors.

It should be emphasised that the indicator being examined – the ratio of obligations to the number of inspections – provides only one perspective from which to assess high-risk sectors. Simplistic conclusions about the overall situation in these sectors should not be drawn based on

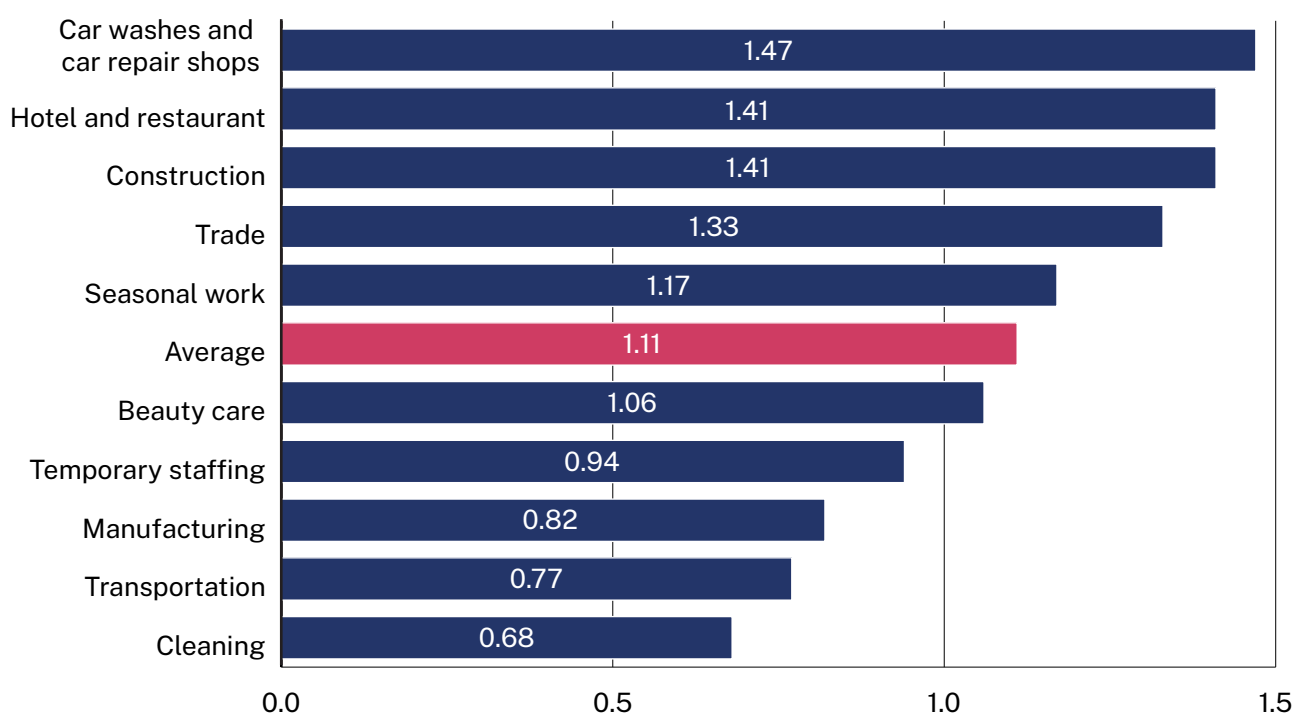
The average number of obligations identified in inspections across different sectors also helps improve supervision.

this figure. In principle, since supervision is based on risk, inspections are targeted at operators and situations with a higher-than-average likelihood of deficiencies. Consequently, the problems identified during the inspections appear disproportionately prevalent in the sector.

Despite this limitation, the metric is suitable for targeting supervision and for evaluating its effectiveness. It can be used to identify both sectors where more obligations are imposed than average and sectors where fewer deficiencies are found and where it may be appropriate to reconsider the scope or focus of supervision.

#### Number of obligations by sector per inspection

The average number of obligations imposed in a single extensive inspection.



**Figure 3.** Number of obligations per inspection in each sector.

The results of supervision clearly highlight car washes and car repair shops (1.47 obligations per inspection), the hotel and restaurant sector (1.41), the construction sector (1.41) and the trade sector (1.33), where the number of obligations was well above the average (1.11). These sectors account for the highest proportion of imposed obligations, suggesting that inspections in these sectors reveal a large number of deficiencies in key enforcement issues. For example, in the first three sectors, the ratio of imposed obligations was more than double that of the cleaning sector (0.68), which is at the bottom of the figure.

The fewest obligations per inspection were imposed in the cleaning sector, followed by the transportation sector (0.77), manufacturing (0.82) and temporary staffing (0.94). However, some caution is warranted when interpreting the figures. For example, the cleaning sector is a high-risk sector for work-related exploitation, so the low number of obligations in relation to the number of inspections hardly means that there are no problems. Rather, it may reflect the focus of enforcement, the inspection methods used, or how effectively deficiencies are identified through inspections using the means available to the OSH authority.

Above all, the results provide a tool for asking follow-up questions. Supervision can be considered successful in those sectors where many obligations are imposed. At the same time, it is worth

The fact that there are few obligations relative to the number of inspections does not necessarily mean that there are no problems in the sector.

considering whether supervision in some sectors should be increased or decreased from current levels. For example, based on the figures, car washes and car repair shops appear to be a sector where increased supervision may be justified. When looking at sectors where fewer obligations are imposed, the key question is whether the problems in those sectors are being identified effectively enough. To this end, it should be assessed whether the current supervision methods and targeting criteria are appropriate or need to be developed.

Taken as a whole, the figure illustrates why the use of relative metrics is important in cross-sectoral comparisons. At the same time, it shows that understanding the context of supervision is essential when interpreting the figures. Key figures should be used primarily as a tool for analysis and follow-up questions, not as a basis for drawing definitive conclusions.

## 3.2 Hotel and restaurant sector

In 2025, a total of 597 inspections were carried out in the hotel and restaurant sector, which is eight per cent less than in the previous year (650 inspections).

In 2025, almost half of the inspections were extensive (281 inspections). In these, the most deficiencies were found in work schedules, recording of working hours, and pay (Figure 4).

A total of 165 inspections (59%) resulted in obligations being imposed due to deficiencies found in the recording of working hours. In the hotel and restaurant sector, employers were issued relatively fewer improvement notices regarding working hour records but more written advice than in other high-risk sectors on average.

A total of 136 inspections (48%) resulted in obligations being imposed for deficiencies found in shift schedules. Just under half of these were improvement notices: slightly more than one in five inspections resulted in such a notice (21%). The averages of obligations imposed for shift schedules have not been included in this report for high-risk sectors. This is because this obligation is not as significant in other sectors as it is in the hotel and restaurant sector.

Most of the shortcomings identified in pay practices concerned the level of base pay and the supplements applicable under the generally binding collective agreement in the sector. In the

### Shift-based working hours a special feature

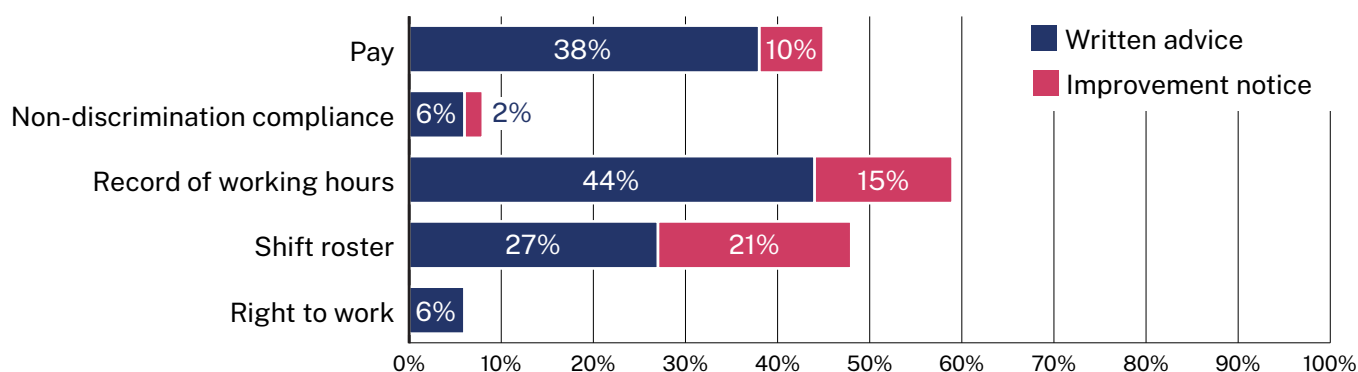
A special feature of the hotel and restaurant sector is the three-week working hours period agreed in the sector's collective agreement. This means that the shift schedule must be drawn up in three-week periods.

Supervision has found that the concept of period-based working hours is not always understood, and there are often deficiencies in its practical application. If a shift schedule has not been drawn up in three-week periods, it is considered incomplete and an obligation is imposed during the inspection. The three-week periods must also be indicated in the record of working hours. If the periods are not stated clearly in the record of working hours, an obligation is imposed. These deficiencies increase the number of imposed obligations in the hotel and restaurant sector.

supervision of overtime compensation, the aforementioned deficiencies in recording working hours emerged as frequent challenges. Since the sector uses period-based working hours, it is not possible to determine additional and overtime work if three-week periods are not indicated in the record of working hours. If the working hours of a workplace have not been arranged as period-based, it is also not possible to monitor whether compensation has been paid correctly.

### Obligations imposed by extensive inspections in the hotel and restaurant sector

281 extensive inspections were carried out in the hotel and restaurant sector. The share of inspections leading to obligations out of all extensive inspections in the sector that addressed the issue.



**Figure 4.** Imposed obligations concerning the minimum terms of employment and the duty to verify the right to work during extensive inspections in the hotel and restaurant sector. Unlike in other high-risk sectors, this also includes obligations imposed for work schedules.

In total, 134 inspections (48%) found shortcomings in pay practices. Ten per cent of inspections found a more than minor deficiency in remuneration, and 38 per cent found a minor deficiency. A minor deficiency is, for example, the employer having failed to pay the occasional evening shift bonus or Sunday bonus. Compared with other high-risk sectors, the hotel and restaurant sector received more improvement notices and written advice than average.

Of the inspections that identified shortcomings in pay practices, 22 also found non-discrimination violations. This corresponds to about 16% of the cases where there were deficiencies in remuneration. In other words, in the majority (about 84%) of cases involving deficiencies in remuneration, there was no discrimination. The result is almost the same as in the construction sector.

281 extensive inspections were carried out in the hotel and restaurant sector. On average, each extensive inspection resulted in 1.41 imposed obligations for key enforcement matters.

In the hotel and restaurant sector, six per cent of extensive inspections revealed deficiencies in the right to work of at least one foreign employee. Written advice on verifying the right to work was issued half as frequently in the hotel and restaurant sector as the average for all high-risk sectors.

### 3.3 Construction sector

In 2025, a total of 396 inspections were carried out in the construction sector. The number of inspections increased by 24% from 2024, when 320 inspections were carried out in the sector. A total of 109 extensive inspections were conducted in the construction sector to supervise not only the right to work but also the minimum terms of employment. Additionally, 179 inspections were conducted at construction sites, and 108 other inspections were carried out only to verify legal requirements, such as the right to work.

In construction sector inspections, supervision focuses on employers and general contractors at construction sites. In supervision related to verifying foreign employees' right to work, a contracting party may also be subject to inspection when subcontracting involves the services of a foreign company.

The majority of the extensive inspections targeted small construction companies, which often operate as part of long subcontracting chains.

Extensive inspections in construction revealed numerous deficiencies in complying with the minimum terms of employment for foreign employees and in verifying their right to work (Figure 5).

Deficiencies related to pay practices were identified in 62 inspections, or more than half of all inspections (57%). Deficiencies in remuneration are clearly more common in the construction sector than the average for high-risk sectors; written advice was issued at about one-and-

109 extensive inspections were carried out in the construction sector. On average, each extensive inspection resulted in 1.41 imposed obligations for key enforcement matters.

a-half times the average for high-risk sectors. The deficiencies involved the hourly wage stipulated in the collective agreement and mandatory wage supplements, as well as overtime and Sunday work compensation.

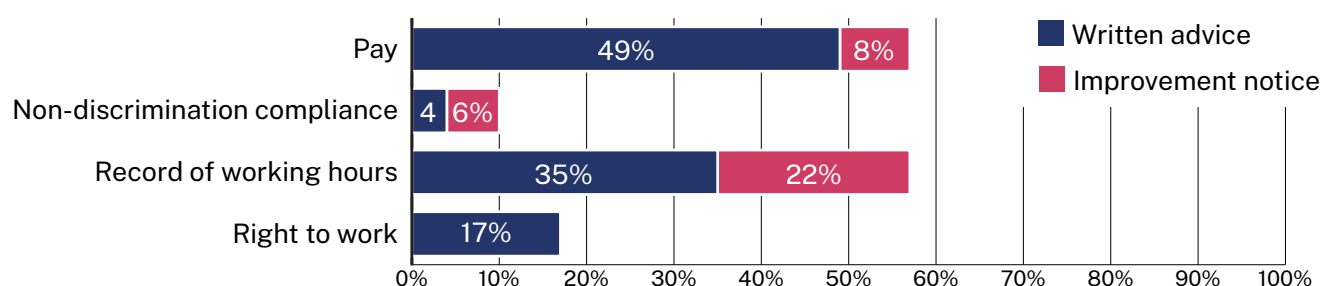
Of the inspections that identified shortcomings in pay practices, 11 also found non-discrimination violations. This corresponds to about 18% of the cases where there were deficiencies in remuneration. In other words, the majority (more than 80%) of the deficiencies in remuneration did not constitute discrimination based on supervisory findings.

Deficiencies in recording working hours were also identified in 62 inspections (57%). In more than one in five of these cases (22%), the deficiencies were deemed to be more than minor, and an improvement notice was issued. An example of a deficiency considered more serious than a minor one is the failure to keep any records of working hours at all or the inability to determine the actual hours worked from the records.

In addition, one in six (17%) extensive inspections in the construction sector found at least one foreign employee who did not have the right to work in Finland.

#### Obligations imposed by extensive inspections in the construction sector

109 extensive inspections were carried out in the construction sector. The share of inspections leading to obligations out of all extensive inspections in the sector that addressed the issue.



**Figure 5.** Imposed obligations concerning the minimum terms of employment and the duty to verify the right to work during extensive inspections in the construction sector.

## Inspections at construction sites

A total of 179 inspections were conducted at construction sites in 2025 to verify that foreign workers were authorised to work in Finland. Construction sites are inspected in cooperation with inspectors who supervise working conditions in the construction sector and compliance with the Act on Contractor's Obligations and Liability. In addition, there is cooperation among authorities: in 2025, the OSH authority inspected construction sites together with the police, the Tax Administration, and the Finnish Centre for Pensions, among others.

Out of all construction site inspections, 14 (or 8%) found at least one foreign worker who did not have the right to work in Finland. In 2024, that figure was 17%. The most common deficiency was that an employee was working in a field for which they did not have the necessary work permit. Unauthorised work was also observed in situations where workers had arrived in Finland under the exception provision on posted workers laid down in the Aliens Act (section 81b, subsection 1, paragraph 4), even though the exception was not applicable to them.



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### 3.4 Seasonal work

A total of 144 seasonal workplace inspections were conducted in 2025, 64 of which were extensive inspections. Approximately half of the seasonal work inspections targeted primary production, i.e. agriculture, berry picking and the forestry sector. Other heavily inspected sectors included the hospitality sector. In practice, all inspections of these sectors were carried out in Northern Finland. It is noteworthy that about three quarters of the foreign workforce in tourist destinations in Northern Finland are EU citizens.

Short seasons are a special feature of the supervision of seasonal work. For this reason, enforcing compliance with obligations is often carried over to the next season.

During extensive inspections of seasonal work sectors, the most common obligations were imposed for recording working hours, remuneration, and verifying the right to work (Figure 6). Deficiencies in recording working hours were found in 32 inspections, or exactly half of all inspections. Deficiencies in remuneration were found in 24 inspections (38%). Every fifth inspection (20%) encountered at least one employee who did not have the right to work. Of all high-risk sectors, the duty to verify the right to work resulted in the relatively highest number of imposed obligations.

Fewer improvement notices concerning working time records were issued than the average in high-risk sectors. In contrast, the written advice issued on the matter was six per cent more than the average.

#### Seasonal work

**Seasonal work** refers to seasonal sectors of agriculture and tourism that fall within the scope of the Seasonal Work Decree (Government Decree on the Agriculture and Tourism Sectors with Seasonal Activities 966/2017).

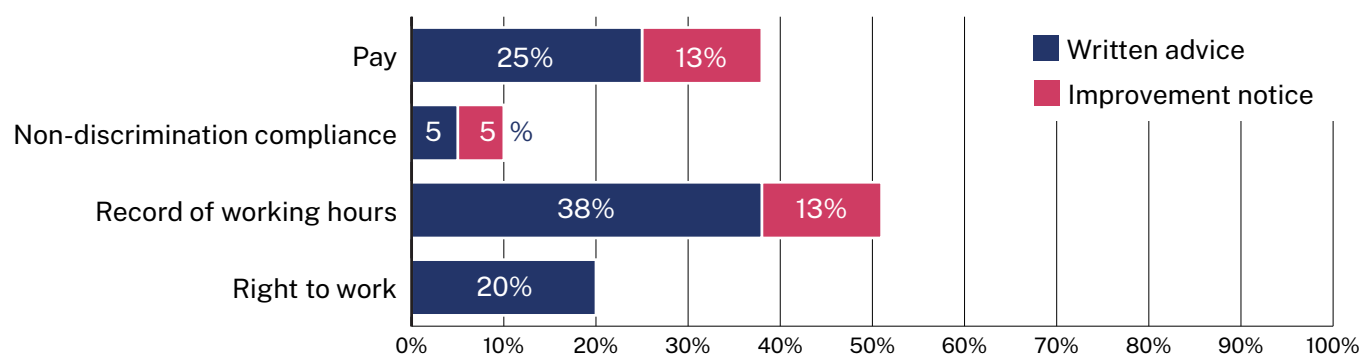
64 extensive inspections were carried out in the seasonal work sectors. On average, each extensive inspection resulted in 1.19 imposed obligations for key enforcement matters.

It is noteworthy that the number of improvement notices issued for deficiencies identified in remuneration was nearly double the average for high-risk sectors. The amount of written advice provided on this matter was eight per cent lower than the average.

Of the inspections that identified shortcomings in pay practices, six also found non-discrimination violations. This corresponds to 25% of the cases where there were deficiencies in remuneration. This share is the highest among the four most heavily supervised sectors and approximately seven percentage points higher than in the construction sector, which had the next highest percentage of discrimination.

#### Obligations imposed by extensive inspections in seasonal work sectors

64 extensive inspections were carried out in seasonal work sectors. The share of inspections leading to obligations out of all extensive inspections in the sector that addressed the issue.



**Figure 6.** Imposed obligations concerning the minimum terms of employment and the duty to verify the right to work during extensive inspections in the seasonal work sector.

The obligations imposed regarding the recording of working hours do not include deficiencies observed in the forestry sector. The Working Hours Act does not apply to clearing and planting work in the forest sector, which is why employers in the forest sector are not obliged to keep a record of working hours. However, shortcomings have been observed in the supervision of working hours in the sector. The supervision of working hours is regulated by the generally applicable collective agreement in the forest sector. According to the agreement, employees must submit a notification of working hours as agreed with the employer. If there are no timesheets, it becomes impossible to verify that wages are paid correctly.

Another problem in the forest sector has been underpayment, as well as long subcontracting chains in which clients no longer know who is actually performing the work. There are several Estonian companies operating in the sector, and inspections have revealed uncertainties as to whether their employees are posted workers or

Inspections of seasonal work have revealed that employers widely neglect their obligation to provide employees with the essential terms of employment as stipulated by the Employment Contracts Act.

have been hired directly from Finland. The lack of clarity has been compounded by cases encountered during inspections where employers and employees have disagreed about who the employees actually work for.

The OSH authority has communicated its inspection findings to large operators in the forest sector, and there are indications that these major operators have begun to pay more attention to the subcontracting chain.

### Inspections in the natural products sector

The natural products sector refers to activities governed by the Act on the Legal Status of Foreigners Picking Natural Products, commonly known as the “Berry Act”. The law has now been enforced for five harvest seasons. The Berry Act regulates the legal status of foreign pickers of natural products. It applies to foreign pickers who pick natural products and have their accommodation and meals provided by an operator in the natural product sector but who do not have an employment relationship with the operator.

By 2025, Finland no longer issued tourist visas for picking wild berries; instead, wild berry pickers from third countries were required to have an employment contract, and standard labour laws applied to their work.

In 2025, about 2,500 Thai berry pickers came to Finland. Since Thais are the largest group of foreign pickers in Finland and have become employed pickers, only nine natural product sector inspections were carried out

in accordance with the Berry Act. The number was the same as in 2024, when the issuance of tourist visas to Thais for berry picking was discontinued.

The number of professional Thai pickers was roughly the same as in previous years, when they came to Finland under the Berry Act. In practice, the pickers come from the same area in Thailand and are largely the same people as in previous years.

With the exception of a few Ukrainian berry pickers, the foreign nationals encountered during wild berry picking inspections were typically in Finland for reasons other than berry picking, such as family ties or studies, and no instances of labour exploitation were found during the inspections.

Six inspections resulted in written advice being issued for failure to comply with the notification requirement in cases where the OSH authority had not been notified in advance of a base camp for the pickers.

### 3.5 Manufacturing sector

In 2025, a total of 134 inspections were carried out in the manufacturing sector, of which 44 were extensive inspections.

Extensive inspections of manufacturing found deficiencies above all in recording working hours and remuneration (Figure 7).

Deficiencies were found in recording working hours in 17 inspections (39%), and in remuneration, in 14 inspections (32%). The amount of written advice issued for recording working hours was less than half the average for high-risk sectors. In contrast, the number of improvement notices issued was slightly above the average.

In the manufacturing sector, significantly less written advice was issued for identified deficiencies in remuneration than the average for high-risk sectors. The share of written advice was the second lowest among the high-risk sectors; only the transportation sector received proportionally less. The situation is the opposite for improvement notices: in manufacturing, notices related to remuneration were issued more often than

44 extensive inspections were carried out in manufacturing. On average, each extensive inspection resulted in 0.82 imposed obligations for key enforcement matters.

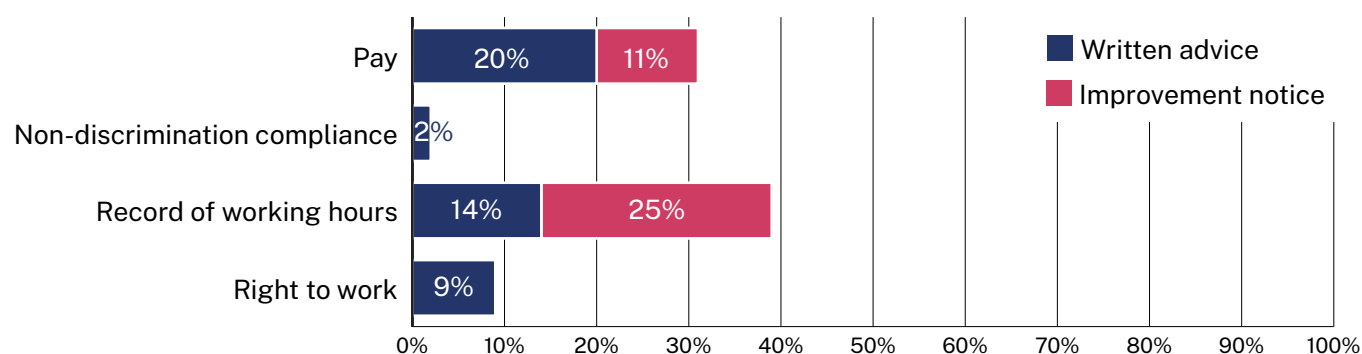
average, and the number was the second highest among high-risk sectors.

Only a single inspection found a non-discrimination violation. When compared with the total number of pay-related deficiencies, it can be concluded that about seven per cent of cases with remuneration deficiencies involved discrimination. However, this finding is based on an individual inspection. This share is clearly the smallest among the most heavily supervised sectors.

Four extensive inspections in the manufacturing sector (9%) found deficiencies in the right-to-work status of at least one foreign employee. The figure is three per cent below the average for high-risk sectors .

#### Obligations imposed by comprehensive inspections in manufacturing

44 extensive inspections were carried out in manufacturing. The share of inspections leading to obligations out of all extensive inspections in the sector that addressed the issue.



**Figure 7.** Imposed obligations concerning the minimum terms of employment and the duty to verify the right to work during extensive inspections in manufacturing.

### 3.6 Other high-risk sectors

A total of 369 inspections were carried out on what are referred to as “other high-risk sectors” (Figure 8). Fewer than a hundred inspections were carried out for each sector.

The results of supervision in other high-risk sectors are examined by comparing, on a sector-by-sector basis, the obligations imposed on employers regarding key minimum terms of employment and the duty to verify the right to work.

Figures 9–11 show the obligations imposed in the other high-risk sectors with regard to pay, records of working hours and verifying the right to work. The minimum terms of employment were not inspected in every case; therefore, the figures presented here are based only on those inspections in which compliance with the minimum terms of employment were examined.

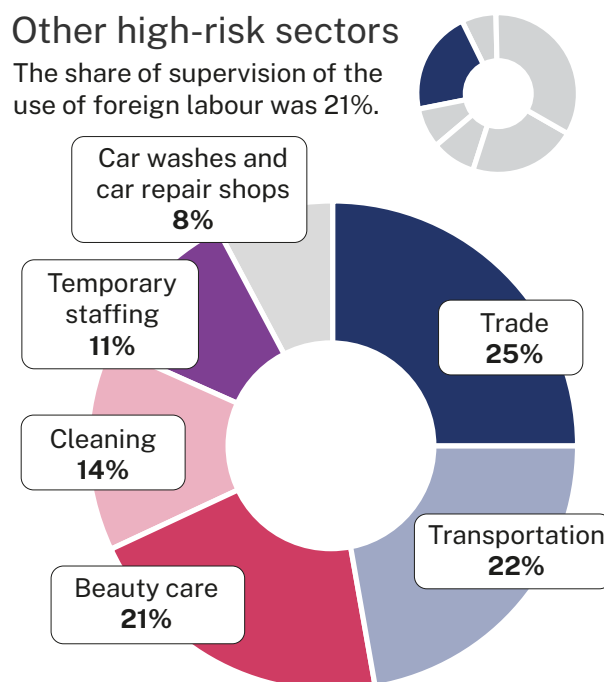
When looking at the figures, it is important to notice two reasons why the results of the supervision cannot be generalised to the whole sector:

1. For some sectors, such as car washes and car repair shops, the number of inspections has been relatively low.
2. Using a risk-based approach, supervision has been targeted at operators whose activities, based on preliminary information, may have involved deficiencies in compliance with legislation.

**Of the deficiencies found in pay**, most written advice and improvement notices were issued to car washes and repair shops. Obligations were

### Other high-risk sectors

The share of supervision of the use of foreign labour was 21%.

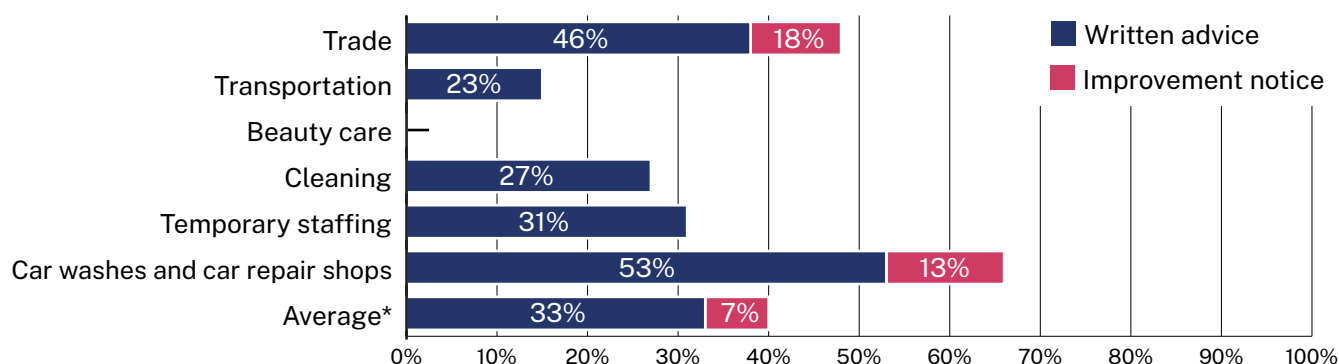


**Figure 8.** Twenty-one per cent of the supervision of the use of foreign labour was directed at these “other high-risk sectors”.

imposed in as many as two out of three inspections (66%). The figure is higher than in any other high-risk sector, and the proportion of improvement notices alone is almost double the average for high-risk sectors. The second-highest number of pay-related shortcomings was found in the trade sector, where almost every second inspection (48%) resulted in the issuance of obligations. The trade sector was issued relatively more improvement notices and written advice than the average for high-risk sectors.

### Obligations imposed regarding pay

The share of inspections leading to imposed obligations out of all inspections in the sector that addressed the issue.



\*All high-risk sectors (hotel and restaurant, construction, seasonal work, manufacturing and other high-risk sectors).

**Figure 9.** Obligations imposed for pay in other high-risk sectors: the proportion of inspections that resulted in obligations out of all inspections conducted in the sector that addressed the matter.

Written advice regarding non-discrimination violations was issued in 10% of inspections in the trade sector. That share is the highest in the high-risk sectors and well above the average. Inspections in other high-risk sectors resulted in very few imposed obligations related to non-discrimination violations. This subchapter does not specifically address the relationship between remuneration and discrimination.

The highest number of obligations concerning **records of working hours** were imposed during inspections in the beauty care sector, car washes and car repair shops, and the trade sector. In the beauty care sector, written advice or improvement notices were issued in four out of five inspections (79%). Among the high-risk sectors, the beauty

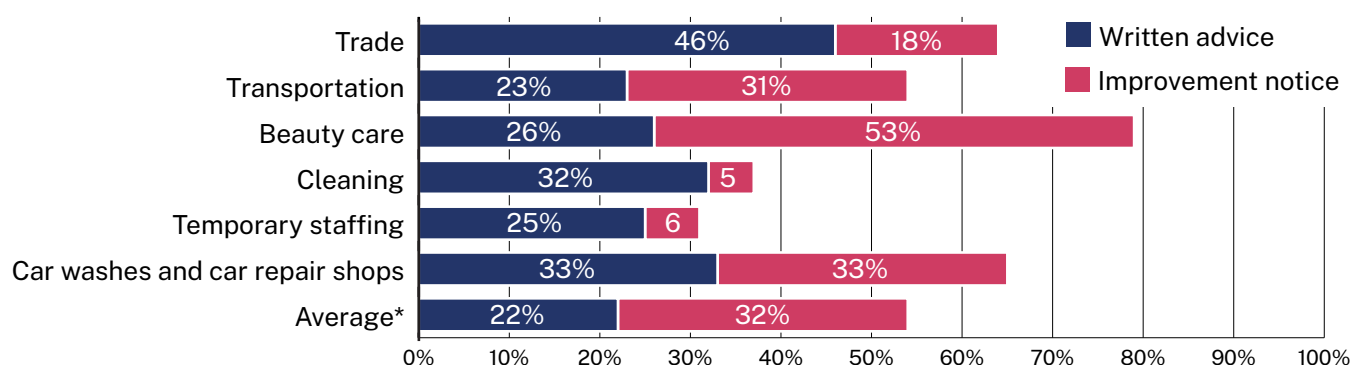
care sector had the highest proportion of improvement notices, with more than twice as many issued as the average for high-risk sectors.

Car washes and car repair shops were imposed obligations in two of three inspections (66%). In the trade sector, that share was almost the same (64%). Car washes and car repair shops were issued roughly the same amount of written advice and improvement notices, whereas in the trade sector, written advice was clearly issued more often than improvement notices.

The fewest obligations were imposed in temporary staffing and the cleaning sector. Improvement notices were issued at less than one third of the average for high-risk sectors in temporary staffing and at under a quarter in the cleaning sector.

## Obligations imposed regarding working hours records

The share of inspections leading to imposed obligations out of all inspections in the sector that addressed the issue.



\*All high-risk sectors (hotel and restaurant, construction, seasonal work, manufacturing and other high-risk sectors).

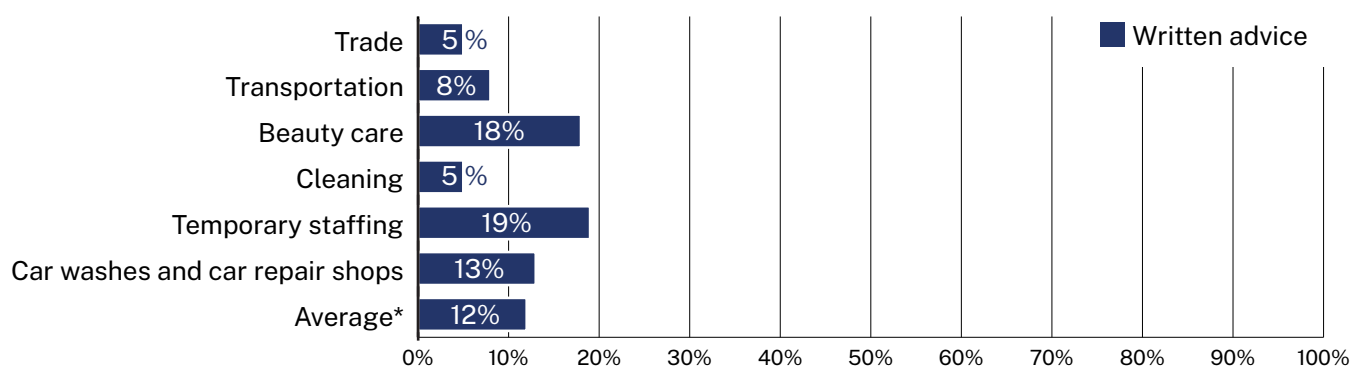
**Figure 10.** Imposed obligations concerning recording working hours in other high-risk sectors: the proportion of inspections that resulted in obligations out of all inspections conducted in the sector that addressed the matter.

The highest number of deficiencies in ensuring the right to work was found in temporary staffing, beauty care, and car washes and car repair shops. In temporary staffing and the beauty care sector, almost every fifth inspection found a deficiency in the right to work of at least one foreign emp-

loyee. In the three sectors mentioned, the share of written advice was well above the average for high-risk sectors. Proportionally, the least written advice was issued in the cleaning and trade sectors, where this figure is less than half the average for high-risk sectors.

## Written advice on verifying the right to work

The share of inspections leading to imposed obligations out of all inspections in the sector that addressed the issue.



\*All high-risk sectors (hotel and restaurant, construction, seasonal work, manufacturing and other high-risk sectors).

**Figure 11.** *Imposed obligations concerning the verification of the right to work in other high-risk sectors: the proportion of inspections that resulted in obligations out of all inspections conducted in the sector that addressed the matter.*

## 4. Reports to the police

Under the Act on Occupational Safety and Health Enforcement, the OSH authority must notify the police if it suspects an employer of having committed an employment offence punishable under a law enforced by the OSH authority or the Criminal Code (Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006, Section 50). A report need not be filed if the act is insignificant in view of the circumstances, and public interest does not require a report to be filed.

Employment offences include employment discrimination and extortionate discrimination at work. Employment discrimination as an offence always requires an employment relationship, so it cannot be applied to work carried out as an entrepreneur. In cases of employment discrimination, it must be possible to prove the grounds for discrimination and the causal link between the discriminatory act and the grounds for discrimination. In practice, it must be possible to demonstrate that, for example, an employer has paid an employee a wage that is too low due to their nationality or origin. If some employees of the same nationality receive pay in accordance with the collective agreement and some do not, it is difficult to demonstrate discrimination on the basis of nationality. However, these cases may constitute fraud or extortion.

Based on observations made in the supervision of the use of foreign labour, the OSH authority filed 10 reports with the police regarding work-related exploitation. These offences were categorised as extortionate work discrimination (8 cases) and extortion (4 cases). A single report may include multiple offences.

The number of reports of offences involving work-related exploitation decreased significantly compared to 2024. At that time, based on its findings from the supervision of the use of foreign labour, the OSH authority filed 24 reports with the police regarding employment discrimination and extortionate discrimination at work, as well as 14 reports of extortion.

However, the number of cases of exploitation reported to the OSH authority is much higher than the figures mentioned above. Some of the cases

Based on findings from the supervision of the use of foreign labour, the OSH authority filed **188** reports with the police in 2025.

come to light when the police request a statement from the OSH authority on a police report filed directly by the complainant, or on related pre-trial investigation material. For example, in cases involving human trafficking, the OSH authority issued 22 statements to the police and opinions to the prosecutor in 2025. Some suspected cases of exploitation are discovered during joint inspections by the police and the OSH authority. In such cases, the police immediately initiate a pre-trial investigation.

**Under the Aliens Act**, the OSH authority must notify the police if it suspects the use of unauthorised foreign labour or an employer's violation of the Aliens Act. In 2025, based on findings from the supervision of the use of foreign labour, the OSH authority filed 60 reports with the police regarding the unauthorised use of foreign labour: 54 reports of employer violations of immigration laws based on unauthorised employment, and 64 reports of employer failure to comply with reporting obligations.

In total, the OSH authority filed 114 reports with the police regarding employers who had used unauthorised foreign labour. 213 reports were filed the previous year. The number of reports has decreased in recent years because Ukrainian citizens have been entitled to work freely under temporary protection. The decline in the number of reports may also be attributed to more effective efforts by other authorities, such as the Finnish Immigration Service and the police. Employers are also more aware than before of the use of unauthorised foreign labour, which is why such labour is being used less frequently.

If a joint inspection with the police reveals unauthorised employment, the OSH authority is not always required to file a separate report with the police.

## 5. Communications and stakeholder cooperation

The OSH authority also strives to prevent labour exploitation through communication and close stakeholder cooperation.

Our aim is for employers using foreign labour to be familiar with their obligations under Finnish labour legislation and for foreign employees working in Finland to know their rights and obligations at work and where to get help if they encounter problems. For example, we can better intervene in labour exploitation when foreign employees personally bring up the issues they have experienced.

During inspections, inspectors provide information about the ground rules of Finnish working life and explain who people can turn to if they need help. Inspectors make use of resources such as the “Know Your Rights at Work” flyer, which provides access to more detailed information in 27 different languages.

Collaboration with various stakeholders is central to communication. Through our stakeholders, we are able to reach many more foreign workers than we could through our own channels alone. One of the key sources of information for foreign nationals living in Finland is the website InfoFinland.fi, which is available in 12 languages. We review the website annually to ensure that the content about the ground rules of Finnish working life is up to date. In 2025, one of the specific target groups for communication efforts was Filipino workers in Finland.

During the year, we participated in eight Newcomer Information Sessions organised by Interna-

Our goal is that employers and employees know the ground rules of work in Finland and where to get help if problems arise. We share this information in cooperation with stakeholders.

tional House Helsinki, where we explained the ground rules of working life to people who had moved to Finland. We met foreign workers face-to-face at the Job Fair in Tampere. One of the goals of participating in these events is to lower the threshold for foreign employees to seek help from an authority, if necessary.

We also communicate about foreign labour issues in the media. We gave 27 interviews to the media on the subject and published two press releases. The topic of the interviews was most often work-related exploitation. The stories covered picking wild berries, seasonal work in the forestry sector, the work of domestic helpers, and nail salons, among other things.

Cooperation between authorities has intensified in recent years. The OSH authority regularly holds coordination meetings with other authorities throughout Finland, including the police, the Tax Administration, and the Finnish Immigration Service.

Tyosuojelu.fi

Website of the Occupational Safety  
and Health Administration in Finland