



Finland (SIAF) Country Report for ITSA Washington D.C. Virtual Meeting

State: Finland, SIAF

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Introduction

The Russia-Ukraine war has affected Finland's resilience and readiness to a great extent. While there is no immediate threat, Finland has a 1300km land border with Russia. Not only does the Russian shadow fleet pose a constant risk of an environmental disaster in the Baltic Sea area, but Russia also continues to conduct hybrid operations and information warfare, which both affect the society at large. Almost all safety investigations conducted, and assessments (preliminary investigations) completed within the past year have had a link to overall safety in the society or the supply chain at large. Finland has a good readiness stance and is well prepared, however as the SIAF is a government agency, it has to take the dynamic security setting into account – especially in communications as the national (esp cognitive) resilience is a key issue. Strategic communications are even more a must than before, and a greater emphasis is placed on training the entire personnel on communications. Additionally, some staff members are on the national critical personnel roster (so called VAP) and this needs to be taken into account in overall planning as these personnel need to participate in refresher training among others.

Finally, the SIAF has observed an increasing number of attempts to influence the independent and impartial investigations.

Major Organisational and/or Staff Changes

The SIAF transferred administratively to a newly created administrative agency as of 1 January 2025. SIAF continues to function as an independent and impartial authority, but the new agency assists in providing routine administrative services for 11 independent agencies.

The SIAF currently has a staff of 17 permanent and one fixed-term civil servants. In addition, the SIAF has approximately 120 experts on the expert roster.

Since the budgetary situation throughout government agencies is complicated, the above-mentioned fixed term position may not be extended.

Over the past year, the SIAF has streamlined its expert hiring practices and the structure of the roster. There is a retirement age (+/- 70) and the "contract" is initially done for a five-year period. In addition, the SIAF has moved towards a more general roster i.e. experts can be used in investigations across investigation branches.

Related to this, the SIAF has streamlined its training system. If an expert goes through the entire training system (also designed for civil servants), it will take approximately four years with three annual training sessions. Some of these trainings are virtual.

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As for the civil servant staffing, Ms. Johanna Järvinen started as the Administrative Director on 3 March 2025. The Administrative Director serves as the primary substitute of the Executive Director.

There have been some voluntary departures in 2024 (6 vacancies in need to be refilled – 4 completed in 2024). The maritime chief investigator position is currently open as the long-term chief investigator retires on 1 October 2025. The number of applicants per position usually varies from 40 to over 200.

New SIAF website to be published in Q3-Q4, 2025. Will reflected the by now rooted value-based functioning of the organization.

Budget Issues and/or Legislative change

Budget: The SIAF budget has remained steady at approximately 2.5 million Euros (out of which approximately 600 000 is allotted to investigations purely and can be adapted if needed). However, given the inflation rate, an adjustment to current levels would be welcome. The Ministry of Finance 1 billion savings target will hit across all government agencies. There is a pressure to decrease appropriations for government agencies within or connected to the judiciary sector by 1.25% (compared to 1% in defence sector and 2.57% in other sectors). This would not endanger the investigations (nor threshold to investigate) as such, but would affect SIAF training, international cooperation participation in international forums among others. No need to lay off people, but if the cuts become reality, this would have an effect. The SIAF is still pending a definite answer from the Ministry of Justice.

Legislative Changes: As a part of the government program on enhancing national security and improving societal resilience, the Safety Investigation Act of Finland from 2011 is in the process of being updated along with the Cybersecurity Act of Finland. The government proposal aims at giving the SIAF the authority to investigate very serious cyber incidents. In addition, the reviewed European Union directive on investigation of accidents in the maritime transport sector will be embedded in the national legislation at the same time.

The government proposal to amend the Acts is currently on consultation round. The amended Acts are planned to enter into force on 1 January 2027.

Challenges

Cyber Security: The National Cyber Security Center has alerted all users in Finland about an increased activity against Microsoft 365 services and programs. As the MS365 is used at SIAF as well, adaptations to information security might be needed (along with bolstering of security) noting that the SIAF does not use the MS365 for storing investigation material.

Information Security remains a high priority with the SIAF and is still a work in progress. The locally installed SharePoint (has been the main working platform) is vulnerable to attacks and for now – while searching other options – the SIAF has transferred more investigation-related material to its hard drive. It is an interim solution, however.

As a part of the overall attempt to enhance information security, the SIAF has completed a process with the National Archives of Finland concerning archived investigation material. As a result of a risk-based assessment, the amount of investigation material stored permanently will decrease. The SIAF will start screening the material of completed investigations so as to assess which part can be deleted permanently.

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Secapp: SIAF has received an appropriation to start using Secapp, a Finland-based communications and alerting SaaS platform. It will enhance the SIAFs safety of communications especially during onsite investigations. The platform will allow different communication, alerting and management measures to be handled from a single platform. The Secapp server is Finland-based and will enhance information security. For more information, please consult <https://www.secapp.fi/>

GPS jamming and spoofing: GPS jamming has been constant since the beginning of the war in Ukraine in the Baltic Sea area and in Eastern Finland. It affects navigation systems overall. While there have not been accidents (at least not recorded) directly caused by the jamming, it has resulted in flight cancellations, airport closures and commercial ships steering off track. The SIAF’s expert pilots experience phantom airplanes figuring on their cockpit monitors on a regular basis, for example. There is a need to rely increasingly on traditional navigation tools - and even more heavily on air traffic control for example.

Recommendations/Issues of Global Concern

An independent investigation team appointed by the government conducted an exceptional event investigation on the data breach targeting the city of Helsinki in April 2024. The safety investigation was published in June 2025. The victim account is estimated at 300 000 and might put a strain on the SIAF staff members’ or experts’ protection against testifying.

SAFETY RECOMMENDATIONS

<p>1. COORDINATION OF INFORMATION MANAGEMENT LEGISLATION</p> <p><i>The Ministry of Finance in cooperation with the Ministry of Justice ensure that the legislation on information management in public administration is coordinated and that the structures for monitoring and steering it are clarified. [2025-S4]</i></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: left;"> <p>VERIFICATION</p> <p>CONSISTANCY</p> <p>COORDINATION</p> </div> <div style="text-align: center;"> </div> <div style="text-align: right;"> <p>LAW</p> <p>STATUTES</p> </div> </div>	<p>3. DEVELOPING COMMUNICATION GUIDELINES FOR DATA BREACHES</p> <p><i>The Ministry of Finance in cooperation with the Finnish National Agency for Education ensure that municipalities and cities develop clear and accessible guidelines for communicating about data breaches, enabling victims to protect themselves from the consequences of data breaches and protect their personal data. [2025-S6]</i></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: left;"> <p>GUIDELINES</p> <p>SUPPORT</p> <p>CLARITY</p> </div> <div style="text-align: center;"> </div> <div style="text-align: right;"> <p>PREPAREDNESS</p> <p>ACCESSIBILITY</p> <p>MULTICHANNEL</p> </div> </div>
<p>2. DEVELOPING THE DETECTION OF INFORMATION SECURITY SHORTCOMINGS IN PUBLIC ADMINISTRATION</p> <p><i>The Ministry of Finance in cooperation with the Ministry of Transport and Communications investigate how the detection of information security deficiencies in public administration can be improved nationally and ensure that public actors have sufficient capabilities for detecting and addressing shortcomings in information security. [2025-S5]</i></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: left;"> <p>UPDATING</p> <p>TRAINING</p> </div> <div style="text-align: center;"> </div> <div style="text-align: right;"> <p>DETECTION</p> <p>RENEWAL</p> </div> </div>	<p>4. IDENTIFYING AND REMEDYING MUNICIPALITIES' CRITICAL INFORMATION SECURITY SHORTCOMINGS</p> <p><i>The Ministry of Finance in cooperation with the Association of Finnish Local and Regional Authorities support municipalities in identifying and addressing critical information security shortcomings and develop risk management relating to information management and information security. [2025-S7]</i></p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: left;"> <p>DATA STORAGE</p> <p>DATA PROCESSING</p> </div> <div style="text-align: center;"> </div> <div style="text-align: right;"> <p>PROACTIVE</p> <p>RISK IDENTIFICATION</p> <p>RISK MANAGEMENT</p> </div> </div>

The current implementation rate of all safety recommendations SIAF has issued is at over 70% (the past year’s status being ‘issued’ until first follow-up message). The SIAF has placed an even greater emphasis on

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discussions with the recipients of safety recommendations prior to final drafting (read wording) of the recommendations during the past year. This has proven to be profitable for the overall effectiveness of safety investigations.

Additional Information

Family Assistance: The SIAF represent Finland in an ECAC working group currently drafting a hands-on guidance document, check-list and template for States to use. The documents should be sent to the DG before the end of the year.

Finland’s national plan for major accidents needs updating (dates back to 2013) and does not include the mandatory family assistance protocol (except for one sentence). The SIAF will publish an investigation this fall where it will recommend that the document be updated, and information thereof disseminated to relevant stakeholders.

Whether a societal change or simply a hazard, the SIAF has had a number of investigations in the past two years with foreign victims. There is not one-window policy for family assistance (even in aviation) and this puts a strain on the SIAF. While the task of the SIAF is to keep victims and their families informed of the progress of the investigation, the SIAF has increasingly had to operate as a liaison for officials in and out of Finland for all victim and family related matters. Even repatriation of remains is of concern in terms of official paperwork. This also puts a strain on translations – and affects investigation timelines. Immigration and community related concerns have increased, and everyday safety and communications on safety is of major concern.

Finally, while safety investigation is not conducted for legal liability nor do safety investigations deal with compensation, the line between safety investigation and legal liability and compensation is increasingly blurred. The SIAF investigation reports (keeping in mind their public nature) have been accepted as evidence in a district court, but not in the higher courts. In addition, the testimonial privilege of SIAF staff members and experts has held for now – mostly due to the fact that every investigation report is a group product. There is also an increasing demand to use safety investigation reports for compensation purposes – latest example from an airline, thus refusing to handle compensation matters prior to publishing of the final report. This will undoubtedly remain a concern in the future.

International Audits / Peer Reviews

NIB network peer review on 14-15 November 2023	Rail	SIAF was found to function effectively overall. A point was made about the reporting structure, which does not follow the EU regulation 100%.
IMO Audit in October-November, 2024	Maritime	No improvements addressed to SIAF, but Finland as a whole was encouraged to enhance reporting.
ENCASIA Peer Review to take place on 13-14 October, 2025	Aviation	

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