Between National Guidance and Local Autonomy: Competence-Based Immigration Policy in Finland

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ABSTRACT

This article examines the multi-level governance of competence-based immigration (CBI) in the Finnish context. International talent attraction and retention strategies going beyond traditional immigration policies have become an economic imperative for many countries, but cities interpret and implement the desired national policy in a varied manner. Using qualitative, empirical data from interviews with governmental and case city representatives, this article analyses the CBI approaches adopted by three case cities at the time of considerable policy changes in Finland. The results indicate that the cities' policy objectives are well aligned with the national policy, but their strategies to reach the objectives vary greatly, as does the involvement of the regional CBI ecosystem as a whole. National institutions are not considered capable enough to support cities sufficiently, and this combined with challenges in resource allocation have become a sore point in the current CBI development in Finland.

Keywords - competence-based immigration, Finland, multi-level governance, policy implementation.

INTRODUCTION

Immigration policy has become more sensitive to economic impacts of immigration, which is reflected in the policy formulation (e.g. Akbari & MacDonald 2014). Economisation of immigration, when market principles and economic logic are applied to immigration, has changed the immigration narrative from the humanitarian or security-driven approach to an input and a resource in the economy (Horvath 2014). Indeed, talent attraction and retention strategies going beyond traditional immigration policies have become inescapable in many OECD countries due to the demographic realities and intensified global competition for talent.

Finland became a country of net immigration late compared to its Nordic neighbours and churned in the state of inertia before starting systematic, cross-administrative policy

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development process to facilitate competence-based immigration (CBI) at a larger scale in the mid-2010s (Hourunranta, 2023). In 2017, the Finnish government introduced the Talent Boost programme to make Finland a more favourable and attractive destination for talented professionals. The programme marked a paradigm shift as it repositioned immigration largely as an economic policy question instead of the accustomed sphere of social policy. The Finnish government started gradually allocating human and budgetary resources, tackling bureaucratic barriers of CBI, and building a national coordination mechanism and infrastructure to systematise talent attraction and retention operations. With a long-term strategy, Roadmap 2035 (Finnish Government 2021) and a permanent budget funding allocation, the Finnish macro talent management framework was gradually built to facilitate talent attraction and retention, and to increase CBI into Finland – not to hinder it.

The complexities of individual immigrants' reception and integration materialise and are managed locally in receiving municipalities, where the local authorities have had the autonomy to define their own position towards national policies and guidelines. In Finland, municipalities have an obligation to organise integration services at the local level, but for immigrants moving for work or studies the services have been limited mainly to the provision of information (Kettunen 2020). However, as of 2025 the municipalities' role and capacity are transformed because of the two major reforms: i) the responsibilities of provision for the employment services, including international recruitment, and ii) immigrants' integration services as a whole are transferred from the government domain to municipalities (Koskimies & al 2024). The baseline for CBI varies greatly across municipalities: over the years, larger cities have gradually taken an active role in talent attraction and retention responding to locally expressed needs and concerns, but some – typically smaller municipalities – have hardly acknowledged immigration as an economic policy issue at all.

We approach the above phenomenon from the perspective of multi-level implementation (Hill & Hupe 2022). Assuming that both the nation-state and the local government play a role in CBI, our purpose is to illuminate the details of this interplay in Finland. The national authorities have certain tasks and expectations of what the local government ought to do, and vice versa. In short, the national-local-interplay can be harmonious or conflictual (Scholten & Penninx 2016), based on different views on resources, tasks and obligations.

Municipal CBI strategies vis-à-vis the respective national policy have remained as a side note in the existing literature. There is a wide array of local policy adoption literature on immigration with the primary focus on immigrant integration and on issues like ethnic and demographic relations or discrimination (e.g. Huang and Liu 2018; Schammann et al. 2021), as opposed to the analysis of CBI policy and governance. The slowly emerging literature on local government responses to CBI is geographically centred around the US (e.g. Huang 2022; Khan-Welsh et al 2023), with little material in the European context.

How does the multi-level governance (MLG) work at the time of considerable CBI policy changes in Finland? This research question is examined through the analysis of the CBI approaches adopted by three case cities. In what follows, we present key concepts, data and methods, and describe the Finnish context and the government CBI policies, and

analyse the relevant literature. Moving forward, we present the case cities, Tampere, Turku and Oulu, and analyse their approaches and the coherence of their policies with national aspirations related to the CBI. We give readers a comprehensive overview of the issues on MLG of CBI and present the findings at the end of the paper.

This research on the national CBI policy and underlying local priorities and dynamics builds understanding of factors supporting or hindering successful policy implementation. We focus on highly skilled immigrants who as a target group have been in a minor role in the research on the local immigration policies, especially in the European context. This research contributes to the literature by examining the CBI policy approaches and dynamics of the MLG at the time of considerable policy changes. New knowledge and understanding contributes to the discussion and theory development of policy adoption, and it also serves the policymakers in this field.

THEORY AND METHODOLOGY

Immigration is complex. The immigration landscape evolves in response to economic cycles, global phenomena, and changes in the political balance, and in this inconstant environment different types of immigration flows emerge in parallel, intersect and overlap at times (Hill & Hupe 2014). To be able to develop balanced and effective policies and public services, decision-makers need to understand immigration as a multifaceted phenomenon. In this paper, attempts are made to examine the CBI as a part of the local immigration strategies and policies, without disconnecting it from its surroundings. To reduce the complexity, we have narrowed the focus of the study to immigrants who possess specialised skills, knowledge, and experience in in-demand occupations in a receiving country. The collective term 'competence-based immigration' refers not only to employed people, but also to entrepreneurs, students and researchers. In the vocabulary of the Finnish government, the term 'education-based and work-based immigration' is used synonymously for the same group of people.

During recent years, the concept of 'local turn' has been frequently used in integration studies (Zapata-Barrero et al. 2017; Kettunen 2021). The term refers both empirically to the importance of local authorities in relation to integration of immigrants, and normatively, to the growing role of local governments, cities in particular, in conducting effective and efficient integration policy. If local governments have more to say in integration policy, the differences between municipalities will increase. Flamant (2020) examines how three major French cities designed their immigrant incorporation policies in the early twenty-first century. While political and administrative structures are similar in these cities, the favoured approaches – integration, equality, diversity – and the importance assigned to the issue of migration differed. According to Flamant (2020) four factors explain the local shape of immigrant incorporation policies: the relationship with national authorities, the mobilisation of European opportunities, the capacities of civil society, and the career paths of policy officers.

With on-going decentralisation of duties and the power related to immigration issues, the Finnish cities have been developing their own policies and approach to CBI. The two dimensions of the local turn (Zapata-Barrero et al. 2017) form the structure of the

analysis: the horizontal dimension refers to the local strategies, governance and policymaking of CBI, involving a wide array of local stakeholders and networks. The vertical dimension regards how the local governance liaises with policymaking processes at the level of the central government: what is the relationship between municipalities and the government, and what is the role of the national policymaking vis-à-vis the local governance. The vertical dimension involves the centre–periphery aspect of MLG. This dimension is examined more closely to answer the research question.

Local governments in Finland enjoy a high degree of autonomy (Ladner et al. 2021), and hence the assumption is that the nation-state cannot dictate the policy. Official policy documents, as formulated in the national capital, may be seen by implementers as less clear and directive than the policymakers in the ministries may think they are (Hill & Hupe 2014). The trouble with so much of the managerialist and "rationalist" model of implementation is that they derive from a notion of decision-making which fails to take account of the fact that human problems are varied in their nature and complexity (Parsons 1995). The division of labour between the national and local authorities also has a normative element, i.e. how to organise CBI in a cost-effective and productive manner. Too heavy and narrowly defined national policy can lead to insufficient, or biased local activity, and too much discretion at the local level can lead to diffusion (Hill & Hupe 2022).

When looking at the state-local government relationship we can focus on autonomy and different ways of supervising. National authorities can make tasks compulsory, earmark financial transfers, and otherwise make an impact on local implementation. In brief, the focus shall be on the 1) national authorities, tasks and expectations concerning local governments, 2) local authorities, tasks and expectations concerning the national government, and 3) analysis of the interplay, how well it functions, and what kinds of conflicts, or tensions, can be identified.

Data and methods

The research material consisted of national and municipal policy documents, strategies and programmes especially on immigration and integration, minutes of meetings, and other municipal documents. Material from the public media, such as news articles, political speeches, and information from the municipal web pages were also utilised. Statistics Finland and Finnish Immigration Service were the primary sources of statistical data used in the research.

The case cities were selected based on their characteristics, which makes the comparison feasible: Tampere, Turku and Oulu are regional centres outside of the capital region. The greater Helsinki area was left out because of the sheer volume of immigration, and the relative ease of branding and marketing as the nation's capital. The case cities, which are regional capitals and growth centres, located in different parts of the country, have roughly the same size of the population. However, the share of immigrant population and the history and the maturity of CBI programmes vary. Case cities are characterised by a growing population, well-established universities, substantial international corporations, and business connections. These features affect the dynamics of policy making and are reflected in the local CBI policy making.

To collect stakeholders' accounts, the authors conducted 15 interviews: four interviewees represented governmental institutions, and 11 were experts, officials, and policymakers at the local level in the case cities. The interviewees were selected because of their professional roles, involvement, and interest in CBI. The interviews were carried out in December 2023 – August 2024. The individual interviews were conducted via video communication tools or in person, and lasted on average an hour per interview. The authors took comprehensive notes, and non-verbatim transcriptions were made from the recordings. The semi-structured interviews followed the same outline, but the questions were tailored according to each respondent's role. The respondents were asked to describe the history and various aspects of CBI in their region, cooperation between local and regional stakeholders, the interplay between the government and the municipal actors, and the impact of upcoming reforms affecting the division of tasks and funding models related to CBI.

ANALYSIS OF THE FINNISH CBI POLICY AT THE NATIONAL AND LOCAL LEVEL OF GOVERNMENT

For the attraction of highly skilled immigrants, countries apply broadly defined two different approaches: one is a supply- or immigrants-driven approach where potential talents are assigned points based on certain desired characteristics and competences, and granted residence if they accumulate enough points. The other principal way of recruiting internationally is demand- or employer-driven approach that allows entry to people only with an existing job (Chaloff & Lemaitre, 2009).

Finland has an employer-driven immigration policy scheme, so to receive a residence permit for an employed person the potential immigrant must have a signed contract, or a binding job offer from an employer (Migri, 2024). This is a common immigration policy tool in the OECD countries. However, point-based systems are considered as more effective and attractive for highly skilled immigrants (Facchini & Lodigiani, 2014), thus increasing the overall depth and width of the talent pool in a country. The restrictive entry policy applied in Finland has its history in the deep-rooted tendency to control and regulate immigration very tightly, and with only limited weight put on labour market considerations. With a growing talent deficit over the last years this approach has been challenged in public discussion in favour of the point-based model (e.g. TEM, 2021), but such a major change in the immigration policy would require large political acceptance. It is also noteworthy that Canada introduced the points-based system as early as in 1967, followed by Australia in 1989 and New Zealand in 1991 (Boeri & al., 2012), which puts them literally decades ahead of Finland. Even with the complete change of the immigration scheme and major renewals in customer processes in immigration, Finland would reap full benefits only after several years of determined policy work.

The Finnish context

Finland has a relatively small immigrant population, but the amount is increasing despite the restrictive immigration policy. Currently some 373 000 foreign citizens live in Finland which constitutes 6,7 % of the total population (Statistics Finland). Net migration has

been the only factor increasing the population since 2010. In 2023, immigration was a record high for the second consecutive year as the net immigration rose to 58 496 persons (Statistics Finland).

The country branding and advancing of the openness of the Finnish working life are tasked to the cross-administrative Talent Boost programme. It has the lead role in formulating the policies on competence-based migration and building the macro talent management framework to support the implementation. In addition to 'orchestrating the Talent Boost ecosystem' – the term frequently used for its role – and capacity building among stakeholders, it has operational roles in establishing recruitment channels to countries with high talent potential. The Talent Boost programme is coordinated jointly by the Ministry of Economic Affairs and Employment (MEAE) and the Ministry of Education and Culture.

Work in Finland as the national authority on CBI

The role of the Finnish government in the CBI promotion is relatively new. Ministries have developed the legal framework and performed regular operations such as issuing residence permits or rooting out labour exploitation, but proactive talent attraction started less than ten years ago. In the first roadmap of its kind, the Finnish Government (2021) presented a plan extending until 2035 on how to promote the immigration of skilled labour, featuring plans like streamlining permit processes, reinforcing international recruitment services for companies, and improving services for foreign researchers and students to establish themselves in Finland.

It is evident that to implement the national CBI agenda, the government and municipalities must cooperate closely: the competition for talent is global, and Finland and its municipalities have limited resources for the purpose. "From the beginning it has been evident that the state and the cities need each other. We must make things nationally in a coordinated manner, as it's more cost efficient to join forces than all cities doing their own thing", a government representative said (Interview #1). This view was echoed by city representatives (Interviews # 6, 8, 10 and 14): when marketing Finland as a talent destination, all interviewees favoured joint operations, and an interviewee (#6) even proposed a stronger branding with other Nordic countries "to fully understand where we come from" (Interview #6).

Business Finland, which operates under MEAE, has been tasked with the promotion of CBI – this was included in the Law on Business Finland for the first time in 2023. Other legal reforms assigned to the KEHA centre – the Development and Administration Centre for the Local Government Authorities – the coordination of the international recruitment. KEHA and Business Finland form the Work in Finland -entity: Business Finland oversees the country image and marketing Finland as a destination to the target group, establishes cooperation and bilateral contracts with the countries of origin, and mobilises participants from the municipalities to join international PR events, and talent fairs. Especially the six largest cities in Finland work closely with Business Finland. One of the concrete tools is workinfinland.com -site which is the first national platform for international talent attraction combining job vacancies in English and information on living in Finland. To this site, cities produce content specific to their region. Business Finland promotes CBI

towards the business community to enhance the companies' abilities and willingness to recruit people with different origins, and maintains an advisor network in India, Brazil, Türkiye, and Vietnam to facilitate the recruitment from there. Municipalities are not obliged to work only under the Work in Finland -umbrella, but according to the Work in Finland authorities (interviews #1 and #2) at least the biggest cities understand the benefits of joint efforts, cost-sharing and coordination. This statement was confirmed by city representatives (interviews # 6,8,10,14). Neither Business Finland nor any other authority has a mandate to command municipalities to operate or not to operate in a certain country, so the Work in Finland operations have to offer tangible benefits to municipalities. From the national perspective, implementing CBI-policy needs to be based on a dialogue rather than commands (Hill & Hupe 2014).

With the transfer of employment services in 2025, municipalities have a legal obligation to operate international recruitment. The task is of general nature, but the new role combined with the demand from the companies is likely to raise new interest towards the Work in Finland -services (Interviews #1,2,6). The challenge lies in the fact that the services transferred to the municipalities were not fully developed under the government's jurisdiction: basically, only EURES aka European Employment Services were polished, existing services, but most other aspects of CBI were yet in the making. "How to transfer something that does not exist yet – can you transfer only the need to develop the services?" asked an interviewee (#1). A fundamental element spurring discontent in municipalities relates to funding: no earmarked resources are allocated to perform the new tasks assigned to municipalities – on the contrary, funding for Talent Hub centres in cities is cut, and municipalities have to allocate funds for the Hubs from the overall state subsidies. The tough negotiations for money are therefore transferred to within the municipality authorities, each fending their respective administrative lots (Interviews #3,4). This makes it more difficult to reach consensus between the national and local authorities.

KEHA has existed for long as a relatively invisible governmental administrative office, but as of 2025, it has a completely new role as a government office in charge of international recruitment. KEHA's new unit is tasked to ensure the level of services in international recruitment throughout the country, including advisory services for employers, databases, information gathering, forecasting, and a job platform for talents and employers. One of the unresolved issues at the time of the writing was forecasting: data collection on shortage occupations and timely responses to employers' emerging needs are of crucial importance. The distance of KEHA from the field was considered as a challenge (Interviews 5, 14), given the unclear division of labour with 15 ELY Centres responsible for the regional implementation and development tasks of the central government.

Many details and processes related to KEHA's new role were yet to be determined at the time of the writing. However, building up a new, large, centralised entity within KEHA for the Work in Finland -function was not fully accepted in municipalities. Whereas the coordination and back-office functions were appreciated and understood, the interviewees from the cities and regional government authorities questioned both the scale of the resources allocated to KEHA and their added value to the field (Interviews 5, 8, 10, 11,

14). "Lots of resources have been found for KEHA: there are plans, ideas and workshops, but often without involvement from the regions, and they haven't got that far in the planning. You can't manage everything at the central level." (Interview #14) The sceptical views were echoed in different regions: "KEHA can't operate directly in the field. In our region, there are 30 municipalities and it's not realistic to operate without a regional operator there between. Overlapping work and information gaps are the biggest risks." (Interview #11) The perceived sense of distance in the planning – whether justified or not – and the lack of trust were strong sentiments throughout the interviews in the case cities.

KEHA's coordination function is further challenged by the heterogenous approaches in the field: operations have been executed in a different manner across the country. At worst they have not been connected to municipal structures or services but operated in an isolated project bubble leaving very little behind after the end of the earmarked funding. In some areas, talent operation may have been conducted mainly from the company perspective neglecting the aspect of employment which is fundamental in the new setup. To build the CBI as a part of the permanent feature of municipalities' employment services and growth policies is an opportunity which is yet to be grasped by many municipalities struggling with immediate financial shortages and political sensitivity of immigration. In sum, the basic element of consensual dialogue, a shared understanding of the policy approach, seems to be not particularly strong. This will be analysed more after the presentation of the case studies.

THE LOCAL LEVEL: THREE CASE STUDIES

Finnish municipalities as public administration entities must have strategies for their long-term objectives for activities and finances (Local Government Act). The strategies outline each municipality's approach to residents' well-being, public service provision, and economic vitality, but there is no obligation to include strategic planning specifically on immigration. Heino and Jauhiainen (2020) state that even though immigration is getting more foothold in municipal strategic planning, the related notions can be vague or ambiguous.

To address the looming talent deficit, the largest cities have introduced different initiatives and experiments over the last 10-15 years (e.g. Säpyskä, 2007). EU structural fund spurred 46 development projects in Finnish cities, with their varied approaches strongly based on prevailing local preferences for labour migration, but the scattered activities had relatively little impact beyond the projects' lifetime. Prior to 2017, without national macro talent management policies in place, each municipality defined their own agenda and approach towards CBI, at best loosely guided by regional strategies (e.g. Pirkanmaa Regional Council, 2008). The cities were actively involved in the national Talent Boost programme implementation but had their unique position in the CBI trajectory.

Regarding the integration, the Finnish system has been described as a funnel (Saukkonen 2020). While the goals of the Integration Act (2010) are broad, the actual measures are focused on refugees and unemployed immigrants. This emphasis also directs the way

resources are allocated. International students, and employment-based immigrants coming to work in Finland are not receiving specific integration services, including language training (Rauhut & Kettunen 2024). Therefore, cities' policies on services provided to these groups of immigrants vary.

The three case cities Tampere, Turku and Oulu are regional cities outside of the capital region, all characterised by growing population, well-established universities, substantial international corporations, and international business connections. Their population and the share of persons with foreign background¹ is presented in Table 1:

Table 1: The population and the share of persons with foreign background in case cities as of 31.12.2023

City	Population	Persons with foreign background (%)	
Tampere	255 050	15,6	
Turku	201 863	10,5	
Oulu	214 633	6,1	

Source: Statistics Finland, population statistics

Tampere

In Tampere, the need for the employment-based immigration emerged as a theme in regional strategic documents in the early 2000s (e.g. Virtanen & al., 2004; Pirkanmaa regional council, 2008). After an active project era, "Talent Tampere" was established in 2014 to create a permanent coordination network to attract and incorporate international talents to local industries. The regional economic development agency hosting the network highlighted immigration as an element of the regional growth strategy and as an economic and innovation policy issue (Tredea, 2016) which was novel in municipal strategies in Finland at the time. Funding from the local policy makers helped Tampere to develop as "the most advanced talent ecosystem in Finland" (Pere & al., 2019).

In 2019, the city of Tampere took the ownership of the talent agenda and incorporated the talent operations into municipal immigrant services, positioned in the Employment and Growth services in the city administration as a new entity called 'International Talent Attraction and Migration Service Unit'. Having CBI within a permanent municipal structure institutionalised its status and helped the newly established unit to follow and implement the national Talent Boost objectives. International House Tampere was opened in 2021, bringing municipal immigration services, employment services, and educational institutions' helpdesks under one roof.

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¹ The definition by Statistics Finland for persons considered having foreign background:

⁻ Both parents or the only known parent have been born abroad.

⁻ Persons born abroad and whose parents' data are not included in the Population Information System.

⁻ Persons born in Finland before 1970, whose native language is a foreign language.

⁻ Persons born in Finland in 1970 or after this, whose parents' data are not included in the Population Information System.

Tampere with its regional stakeholders, prepared a strategic programme on international talent attraction and migration in 2019, revised in 2023. The programme, which is the first of its kind in Finland, has a heavy emphasis on the economic value and potential of international talents. The revised strategic programme (2023) had updated entries on entrepreneurship, innovation platforms and linkages to regional invest-in operations which reflected the origin of talent operations in the regional economic development agency. The documents followed the vocabulary of the Ministry of Economic Affairs and Employment on themes like ecosystems, platform-based operating models, and service alliances which set the emphasis on highly skilled talents. The Strategy and Vision 2030 of Tampere further highlights the importance of international talent attraction, migration and internationalisation as an all-encompassing theme. The focus of the current strategy is on attraction and retention of international degree students and other highly skilled immigrants. The municipal integration programme, which serves mainly other immigrant groups, can be characterised more as a non-strategic service catalogue (Koskimies & Kettunen, 2022).

Tampere Welcoming City Strategy (2023) outlined the long-term vision, according to which the city will become Finland's most attractive destination for international workforce and students, and where internationalism is based on inclusive, ecosystemic city development and extensive cooperation with the international community. Such municipal strategy is novel in the Finnish context, as the focus is taken out of immigrants, employers and the related service structure to the different level: focusing on the surrounding society as a whole.

The dominance of Tampere in the regional cooperation is very strong. With the decentralisation of government employment services and international recruitment, Tampere has raised itself to a position where other municipalities are somewhat left aside. According to a regional authority "the city of Tampere has a strong grip on this issue, but we should remember the entire region. Things look very different in the city and in the fringes of the region, and sometimes the labour-based immigration is more of an issue there than in the city." (Interview #14) This division is reflected in the local CBI coordination with two overlapping networks for the purpose: one by the local government authority representing all municipalities of the region, and another one run by the city, with a narrower focus. Of other regional stakeholders, Tampere Chamber of Commerce set up their own Work in Tampere site where large companies post their vacancies, and information on living and working in Tampere is gathered. The parallel Work in Finland site was considered too distant, and information on living and working in Tampere too scattered (Interview #13).

All in all, Tampere's approach to CBI extends beyond filling immediate labour shortages and the theme is high on the city agenda. Tampere seeks extensively for highly skilled immigrants, facilitates companies' ability to benefit from international competence, and has an impressive strategy striving for an inclusive, international city development. Whereas elevating international talents' value is necessary for wider acceptance and can be considered positive as such, underlining people's economic usefulness poses a risk of dividing immigrants to desired versus undesired categories.

Turku

The city of Turku has a long-standing history of international trade and multicultural population. It was among the first Finnish cities to receive refugees from Chile in the 1970s, and integration and active employment schemes for immigrants have been built from the 1990s onwards. Social cohesion is one of the objectives also in today's immigration policy in Turku: "The theoretical basis for our work is the Stiglitz's model on wellbeing, and we aim at supporting immigrants' integration widely on its different dimensions. We don't focus on employment or studies only, but advance other aspects as well, like the sense of security, social relationships, and all the other dimensions." (Interview #8).

Employment immigration was identified in the regional planning at the same time as in Tampere, in the early 2000s (e.g. Anis & al., 2007), and various short-term projects were implemented. The city's research unit called for a more cross-cutting approach to immigration, especially to put it in the agenda of the local economic policy in 2012 (Salminen, 2012). In Turku, talent attraction, international recruitment, and other related CBI activities have been strongly centralised to the regional economic development agency Business Turku (formerly Science Park Turku).

Whereas the cooperation with local businesses is tasked to Business Turku, the city is Turku oversees immigrants' reception and integration in a more traditional sense (Interviews #8,9). International House Turku (IH Turku), founded in 2021, provides multilingual counselling and guidance services. The IH Turku is profiled as a service point for all immigrants, and there are no specific services for highly skilled talents. Unlike Tampere and Oulu, the IH Turku does not provide services for companies. IH Turku is based on bringing different services together and using the resources in a flexible way to benefit all immigrants irrespective of their status. Although the earlier emphasis on refugees shifted toward a broader approach in welcoming immigrants, most of the resources are spent on general advice and support of employment within the IH Turku.

In Turku, cooperation between the partners is well-established with different instruments to support the CBI and especially the cooperation with businesses. For example, the local Chamber of Commerce is actively promoting the recruitment of internationals: "Our task is to wake companies up! We do it gently, bringing out other companies' good experiences, because the fact is that we run out of employees. We can't have strong export businesses and successful industry sector if we don't get a great number of international talents here." (Interview #7). This mentality advanced both by Business Turku and the Chamber of Commerce, the two stakeholders closest to companies, has lowered the threshold to international recruitments. Business Turku is also advancing the doctoral students' and researchers' non-academic careers especially in niches in IT, health technology, and pharmaceutical industry (Interview #9): "The university has such top talents that it's a priority to retain them here. Non-academic careers are highly beneficial for talents and companies, but neither universities nor public employment services have this type of career guidance for researchers. This should change in the ongoing employment reforms."

To summarise, the CBI efforts in Turku have limited, but well-targeted resources, and active networks and close cooperation with companies yield positive outcomes. Turku has a created a strategy where highly skilled talents are valued but the needs of other immigrant groups are also equally important.

Oulu

The city of Oulu, located in Northern Finland, has been actively promoting the region as a destination for international talent since the early 2000s. One of the earliest initiatives aimed at attracting international talent to Oulu was the 'Oulu ICT Strategy' in 2004 which was one of the first international, targeted talent attraction campaigns in the Finnish context. Oulu had excellent marketing initiatives: it branded itself as the capital of Northern Scandinavia and introduced authentic events like Polar Bear Pitching in a frozen lake to utilise the cold and darkness for its benefit. Oulu has also branded itself unofficially as a winter cycling capital of the world.

The first International Talent Programme in Oulu to attract international talent and to support their integration into the local community was introduced in 2017, but for long the projects and services were scattered and stakeholders were unorganised or even unaware of each other's activities in this domain. The establishment of the International House Oulu (IH Oulu) in 2023 under the city's economic development agency, Business Oulu, has helped to centralise some services for immigrants and businesses. Another step to improve networking was the local government agency ELY Centre introducing regular meetings in the end of 2023 to facilitate the information exchange in CBI. The need for coordination was obvious, as the Talent Boost funding was channelled to different projects via two ministries, but the local authority had no tools to monitor what different stakeholders were doing: "For us it seemed for long that there were no connections between Talent Boost operations, and we knew nothing about the major funding to the university, which was channelled via the Ministry of Education. If coordinated from the beginning, we could have achieved a lot more together" (Interview #11).

In Oulu, some isolated talent attraction campaigns targeted at IT professionals have taken place in recent years, but the current focus is strongly on employment of people residing in the Oulu region, rather than making Oulu more attractive and welcoming for new immigrants. The question is, if this mentality prevents developing necessary CBI activities for companies in need of specific workforce.

As of 2025, Oulu has placed the employment services in an unaccustomed way under the command of Business Oulu. This brings the companies and both Finnish and foreign jobseekers closer to each other. As IH Oulu operates in the same premises with Business Oulu, the services are well concentrated from the immigrants' point of view. Despite the upcoming changes in the funding structures, the services at IH Oulu are planned to continue as extensively as with the government project funding previously. It must be noted that Oulu has drawn a clear line between services funded on the public funds visà-vis what benefiting companies are expected to cover: at the time of shrinking resources, this helps to maintain the level of services as they have already been quite lean.

In summary, the CBI strategy in Oulu is cautious and still evolving, and the whole talent ecosystem remains in its early stages, yet the direction is encouraging. Oulu's operations toward CBI have been sector-specific, particularly targeting the IT industry, and the city lacks a broader, cohesive plan for international recruitment across other sectors. A desire to cater for and benefit from international talents as an engine of growth and internationalisation is – except for international students – hardly visible in municipal strategies and visions. The interviewees describe political discussion on immigration as heated and politically loaded, seemingly more so than in other big cities in Finland. In 2024, racist incidents harmed the city's reputation as a hospitable destination for international talents, being a sad indication on the tensions on the ground.

RESULTS AND DISCUSSION

The three case cities – Tampere, Turku and Oulu – have similar characteristics and backgrounds in international talent attraction, but represent, however, diverse approaches to CBI. Even after the completion of ongoing reforms, the government CBI policy leaves significant space for municipalities to define their own approach. The approach of these cities is shaped by their specific circumstances, histories, strategies, stakeholder networks, and internal organisational structures.

Characteristics of the horizontal governance

When looking at commonalities, all cities have worked and will continue to work on CBI promotion at some scale, as the demographic challenges are well understood. Local level policy practices do not substantially deviate from nationally formulated CBI policies. All case cities seek active cooperation with the business community and promote the benefits of diversity and international competence, at least on paper.

Cities have made different decisions on the homebase of CBI services: Oulu places the services to the domain of Business Oulu, in Tampere services are in Employment and Growth Services, and in Turku organisationally under Integration which refers to municipal co-creation and development rather than integration as the word is used in the context of immigration. Whereas Oulu and Tampere strongly emphasise employment and economic productivity of all immigrants, Turku underlines the overall well-being of residents and the diversity of human needs and priorities in the spirit of Joseph Stiglitz (Stiglitz et al. 2009). The stakeholders in Tampere and Turku have been actively involved in Talent Boost / Work in Finland talent attraction campaigns and international events for several years and have systematically built their know-how and mechanisms to engage companies to these events. In Oulu, talent attraction has been more sporadic and reactive, yet they seek to cooperate closely with Work in Finland entity if the needs emerge.

The case cities present international talents differently in their municipal strategies: The city of Oulu basically lacks an explicit policy on CBI, and Tampere has developed thorough but highly economy-driven policies. Turku for its part, has recognised the strategic significance of international population for the city's growth, but is seeking the balance between integration and CBI objectives.

Tampere has a separate strategic programme on international talent attraction and migration, and Welcoming City development programme, which aims at "investing in attracting international talents and ensuring the retention of talents and their families". The programme also set the prevention of segregation as an objective, but the economisation of immigration is strongly present throughout the document. Even in the focus area "International Home" the programme itself draws lines by only considering people primarily in terms of economic value: "The goal is to strengthen the sense of belonging for international professionals living in Tampere, facilitate their integration into local communities, and enhance the retention of international talent living in Tampere." (Welcoming Tampere, 2023) This type of selected tolerance only for the beneficial immigrants makes unintentionally a deep bow towards anti-immigrant political parties and may backfire by leaving other immigrant groups with the sentiment of non-belonging.

Coordination mechanisms and working groups have been established in all regions, sometimes even several networks with partially overlapping functions. Participation of the local business ecosystem is at a good level, as representatives of business agencies are well incorporated into the coordination networks in all three cities. However, it strikes the eye that immigrant NGOs or immigration or multicultural councils are not systematically involved in any region — occasional civil servants with immigrant background are a part of the coordination mechanisms, but larger inclusion of representatives of target groups is lacking. A comparison between the case cities reveals both similarities and differences, presented in Table 2 below:

Table 2: Comparison of aspects of competence-based immigration in the case cities

	Tampere	Turku	Oulu
Main emphasis	Economic rationality	Pluralism and social cohesion	Developing a coordinated approach
Most relevant operations	Inclusive city planning, place branding and image building for int'l talent attraction.	Working life diversity, talent attraction and retention schemes. Support to integration of all immigrants.	Matching services, advisory services and technical support for employers.
CBI in the city structure / organisation	International Talent Attraction and Migration Service Unit in Employment and Growth Services of the city of Tampere	Immigration Services in Integration (a chapter for cross-administrative coordination for overall well-being of residents)	Business Oulu (Regional economic development organisation)
City strategies on CBI (excl. mandatory Integration programmes)	Strategic programme on international talent attraction and migration (2019/23); and Tampere Welcoming City development programme (2024)	Welcome to Turku programme (existed as a concept since 2013); and Turku City Strategy 2030	No specific CBI strategies. Mentions on talent immigration, integration, and retention in the city strategy.

Regional coordination	Two separate networks, one by City of Tampere (narrow focus) and another by the regional governmental authority (larger geographical coverage).	A wide stakeholder network coordinated by City of Turku with a board geographical coverage; networks to develop specific aspects of the CBI, esp. cooperation with companies by Business Turku and Chamber of Commerce.	Regional governmental authority (newly established).
Policy objectives	Human capital to the economy; talent attraction & retention to benefit business life; employment, entrepreneurship and self-sufficiency.	Overall well-being of immigrants; talent attraction and retention; employment, equality; self-sufficiency.	Employment of immigrants; self-sufficiency; Finnish skills. Branding Oulu as an international city. Tackling racism.
Local businesses' and economic actors' involvement	Chamber of commerce active in advancing the agenda; Work in Tampere -site.	Strong cooperation with companies; university involved in matching researchers to companies. Chamber of Commerce active in advocacy and campaigns.	Proximity to companies secured; immigrant services and CBI promotion in Business Oulu.
Social inclusion and tolerance	Tampere Welcoming City programme aiming at inclusive city development.	Internationalism as a part of the identity and a cross- cutting aspect in the city strategy.	Racism and discrimination; intolerant public discussion, antimmigrant sentiment
Immigrant associations involvement	Not a part of the coordination networks. Individual city employees possibly.	Not a part of the coordination networks. Individual city employees possibly.	Not a part of the coordination networks. Individual city employees possibly.

Source: Synthesis by the authors

The main difference in these approaches lies in the narrative on the immigrants' role in the municipalities' policies: in Tampere, the economic rationality is emphasised, resulting in policy and action plans which focus strongly on the provision of necessary human capital for business activity and economic growth. Turku aims at embracing the benefits of international talents in a more holistic manner, paying attention to social cohesion and inclusion of all immigrants into society. Oulu, then, is still in the process of identifying where it stands in relation to the international talents and CBI: there are tools and services developed to support the phenomenon in a limited manner, but the local policies do not recognise its significance.

Dynamics of the multi-level governance

The responsibility for organizing public employment services is transferred from the state authorities to municipalities and municipal co-management areas in 2025. A total of 45 new employment areas have been formed to manage all employment services, including international recruitment. This is an entirely new situation for local governments, and it

remains to be seen how the new employment areas organise the services, and whether the CBI related tasks are maintained beyond the legal minimum. Different from earlier, employment policy at the local level shall also contain political elements. Many Finnish municipalities have the anti-immigrant Finns party in a strong position, and this may affect integration and immigration related policies. This can be seen at the national political agenda already.

The decentralisation of employment services to municipalities marks the characteristics of the local turn (Zapata-Barrero et al. 2017). At the same time, it can lead to increasing variation of local integration policies, making it more difficult for the national authorities to negotiate with municipalities.

The implementation of the CBI policy in Finland is to a large extent characterised by harmonious interplay and the cities' local CBI policies correspond to the national expectations. This is not surprising considering that the Ministry of Economic Affairs and Labour has since 2018 supported these activities with earmarked grants with objectives in line with the national intentions. However, alongside this harmonious interplay, some tensions can be identified:

- The division of resources, especially the funding allocated to the construction and set-up of KEHA as the national authority to coordinate the international recruitment.
- Doubts on KEHA's capacity to support the whole range of different municipalities as their needs and experiences vary greatly.
- Questions on KEHA's capability to fulfil its forecasting task, given its distance from the field and the quickly changing situations in companies.
- Within the government, the division of labour between KEHA and the regional state authorities.
- Within municipalities, inclination to favouritism toward international talents over other immigrant groups.
- Potential of political conflicts in municipalities when the municipal councils get more to say in a local integration policy.

Many of the tensions culminate to KEHA: whereas it is generally understood that 45 employment areas need a coordinating body, the new unit is considered distant, consuming the funding that would have more leverage at the local level, and incapable of meeting the expectations and the tasks set for it. For KEHA to succeed in its new role, it will need continuous backing from the government for a few years to come. In addition, the government's inability to retain talented professionals is a great concern, especially with the recent tightening of the immigrant policy. For example, Papademetriou & Hooper (2019) point out, immigrants' decisions to stay or move are influenced by professional opportunities, the quality of life, the fairness and efficiency of the immigration systems, and the opportunities for obtaining permanent residence, citizenship and family reunification. The current policy of the Finnish right-wing government is in favour of highly selective competence-based immigration, but the overall immigration policy measures related to the retention aspects are widely seen as counter-productive. This policy, combined with the current economic gloom, means that

the CBI efforts at local and national level face the risk of not meeting the goals in strengthening the workforce as desired.

CONCLUSIONS

This paper introduced highly skilled immigrants as a specific target group of the local policy in three case cities, and examined the CBI policy approaches and dynamics of the MLG at the time of considerable policy changes in Finland. In sum, the CBI policy in Finland is at a turning point: as of the beginning of 2025 local governments have full responsibility in international recruitment, and new institutional structures are being formulated. Funding patterns have been revised, and local authorities must make both strategic and financial decisions to determine the outlook for international competence in their region.

The theoretical contribution of the article lies in applying the multi-level governance framework to CBI policy. Governance can be argued to be context-based, and the preceding analysis highlights specific governance issues, both horizontal and vertical, in which national authority and local implementation are formulated accordingly. The framework, the acknowledgement of multi-level governance structure, and the relationships between the actors, can be argued to raise relevant issues. To make the framework more robust, it would benefit from the analyses of multi-level CBI policies in different politico-administrative systems (Ladner et al. 2021).

Practical recommendations can be made to local policymakers to address some of the issues presented in this paper. Firstly, the role of immigration must be identified and spelled out in the local economic and growth policies, and the municipal services adjusted accordingly in the proper administrative stratum. Secondly, at the local level retention needs to be systematised, and secured as a part of local policy. Even though Work in Finland has been successful in institutionalizing a national talent attraction system and facilitating the inflow of highly skilled international professionals, the retention in local communities will dictate whether the desired talents will stay or go. The influence of spouses and children in decision-making must not be overlooked. Thirdly, the immigration narrative cannot be narrowed down to economic benefits or cherry-picking the best and the brightest talents only. Given the level of salience and politicisation of immigration, highlighting immigrants' economic value and tax income to gain acceptance by the wider public is understandable but poor policy making. Labelling people only as economic assets, and categorising immigrants in terms of their economic productivity is short-sighted policy making which feeds societal polarisation instead of tolerance.

Seen from the perspective of multi-level governance, the CBI implementation in Finland shows some tensions between the national and local level of government. The objectives

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are well aligned across different levels of the governance, but the national institutions, principally the KEHA Centre, are not seen as capable of supporting the cities' efforts in a sufficient manner, and the discontinuation of the earmarked funding causes dissatisfaction and friction. From the national point of view, local governments have been too dependent on the government projects and need to increase their own funding for welcoming and integrating international talents. This bottom-up emphasis in CBI may lead to cities planning their own measures, rather than cooperating with the KEHA and other national authorities. There would be a need to analyse more in detail the evolvement of local CBI policies after the 2025 reform.

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The authors report there are no competing interests to declare.

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