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Turin, 23-24 November 2026

Technological challenges, with particular attention being paid to the introduction of digital technology and artificial intelligence into the organisation of the administration and administrative justice

QUESTIONNAIRE

Responses from Supreme Administrative Court, Finland

This questionnaire has been prepared in anticipation of the seminar to be held in Turin on 23 and 24 November 2026. In accordance with point 2 of the guiding principles adopted by the Hellenic Presidency of ACA-Europe, it aims to explore the current challenges facing administrative judges, particularly those related to technology, and more specifically the introduction of digitalisation and artificial intelligence into the organisation and functioning of the administration and administrative justice.

In order to gain an in-depth understanding of the various dimensions of these technological challenges, the survey is split into three parts:

Part A - The digitalisation of administrative proceedings, with a focus on the experience of various supreme administrative jurisdictions and the impact of this transformation on the organisation and conduct of judicial activity.

Part B - Automated administrative decision-making and judicial review by administrative courts, particularly issues of technical discretion, automation and the delimitation of judicial powers.

Part C - The role of the administrative judge and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, particularly in light of Regulation (EU) 2024/1689, known as the 'AI Act', as well as other European Union standards and regulations, such as Regulation (EU) 2016/679, known as the 'GDPR', Regulation (EU) 2022/2065, known as the 'DSA', and Regulation (EU) 2022/1925, known as the 'DMA'.

Part A

The digitalisation of administrative proceedings and the use of artificial intelligence tools by the administrative justice system

A.I – Infrastructure and technological organisation

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A.I.1 – Digital equipment and resources

1. What is the level of digital equipment available to judges and administrative staff?

☐ Non-existent
☐ Limited
☐ Intermediate
X ☐ High
☐ Complete
Please explain if necessary:

Cases are exclusively managed - from start to finish - electronically. This includes the registering of cases, preparing for decision, digitally signing and expediting decisions. Each employee in the administrative judicial system is provided with the requisite equipment. The equipment (both hardware and software) enables work in a secure environment independently of location. The equipment and resources are of a high standard; however, given financial constraints and data protection requirements, it would be an overstatement to describe the setup as 'complete.' That said, we have the necessary tools to operate effectively in a digital environment.

2. Is the technological infrastructure (networks, servers, equipment, connectivity) suited to the day-to-day operational needs of the administrative jurisdictions?

☐ Strongly disagree
☐ Somewhat disagree
☐ Neither agree nor disagree
X ☐ Somewhat agree
☐ Strongly agree

Please explain if necessary:

The are a relatively frequent technical issues related to the electronic case management system and the reporting functions connected to it, and it is not functioning in an optimal fashion. It is system that is being continuously developed.

The technological infrastructure is, for the time being, on premise, with a cloud migration under evaluation. Cloud migration will hinge on data protection issues and considerations related to contingency planning.

A.I.2 – Cloud solutions, remote access and interoperability

3. To what extent does your jurisdiction use cloud-based solutions for its information systems?

☐ Not at all
X ☐ To a limited extent
☐ Moderately

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☐ Extensively
☐ Completely
Please explain, where applicable, and, in the absence of cloud solutions, specify the alternative infrastructure solutions implemented:

So far, it has not been possible to find a cloud-based solution that would satisfy GDPR (and EU directive on data protection in criminal matters) requirements for processing special categories of personal data. Therefore, the central operating systems (i.e. all systems which are used to process personal data and/or classified data) are based on on premise-solutions.

3a. Do the adopted technical solutions enable judges and staff to perform their duties remotely using the institutional equipment made available to them? If so, please specify any limitations.

Yes, except for matters involving material classified above a certain level, all duties can be performed remotely using institutional equipment.

3b. Are the applications being used interoperable with other national or cross-border judicial IT systems? If so, please specify the extent of this interoperability.

Key systems/applications have interfaces with various government authority systems.

A.II – Digitalisation and dematerialisation of judicial administrative proceedings

A.II.1 – Dematerialised administrative proceedings

4. Is a dematerialised judicial administrative proceedings system in place within your jurisdiction?

☐ No
☐ Yes, at an initial stage
☐ Yes, at an intermediate stage
☐ Yes, at an advanced stage
X ☐ Yes, on a fully integrated basis
Please explain if necessary:

The judicial administrative proceedings system is fully digital since the beginning of 2020.

Applicants can file electronically, but the system has not attracted a wide audience. Most filings are done using email. One imperfection of the electronic system for the public, which is under development, is the access of legal assistants to electronically manage their clients cases using the electronic case management system.

4a. When this system exists at least at an initial stage, do judges and staff process and sign documents exclusively in digital format in their everyday working practice?

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☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
X ☐ Always

Please explain if necessary:

4b. Percentage of paper files prior to the implementation of dematerialised administrative proceedings that have been digitised:

☐ 0–20%

☐ 20–40%

X ☐ 40–65%

☐ 60–80%

☐ 80–100%

A.II.2 – Digital services for members of the public, lawyers and public authorities
5. Are digital services available for filing documents, consulting files, notifications, payments or other related services? If so, please specify which ones.

Digital services are available for filing documents and for notifications.

6. Do these digital services guarantee an adequate level of accessibility for people with disabilities?

☐ 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

X ☐ 80 - 100%

7. Are lawyers involved in the design, development and implementation of digital platforms and tools intended for their use?
If so, please specify the terms of this involvement.

According to law, the National Courts Administration and the Legal Register Centre (an independent authority under the Ministry of Justice) are responsible for the maintenance and development of the information systems of the courts. The courts are heavily

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involved in the planning and implementation of information systems. When developing information systems, stakeholders, such as the Bar Association, are consulted when it comes to tools intended for their use.

8. Are there any support and training measures in place for users outside the court system (lawyers, members of the public, government agencies) regarding the use of the digital tools available to them?
X ☐ YES
☐ NO

If so, please specify which ones

Support channels and training content available online.

A.III – Security of information systems and data protection

A.III.1 – Compliance with the regulatory framework

9. Do your jurisdiction's information systems comply with European and national standards on security, data protection and digital preservation?

☐ Strongly disagree
☐ Agree only slightly
☐ Indifferent
☐ Somewhat agree
X ☐ Strongly agree

Please explain if necessary:

A.III.2 – Incident management and business continuity

10. Are IT security incidents dealt with promptly and effectively?
☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
X ☐ Always

11. Are business continuity and disaster recovery plans regularly updated and tested?

☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
X ☐ Always

A.III.3 – Publicity and dissemination of court decisions

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12. Are court decisions available online in their entirety?

☐ Never
X ☐ Rarely (only for the most significant decisions)
☐ Occasionally
☐ Frequently
☐ Always

Please add any additional information and explain if necessary:

The supreme courts publish their precedents. For the Supreme Administrative Court this means around 100-120 decisions a year. In addition, the SAC publishes certain other decisions which are deemed to be of significant public interest, albeit not precedent-setting - around 30-50 decisions/ year.

Lower courts publish summaries of their most important decisions. For the administrative courts this means around 10 published summaries/year/court.

Court decisions are published on Finlex, which is a free, public online database of legal information owned by the Ministry of Justice.

13. Where a system for publishing decisions online is in place, is there an internal policy to ensure the protection of personal data and respect for the right to be forgotten?

☐ No
☐ No formalised policy; anonymisation is carried out by the registry services on a case-by-case basis
☐ No formalised policy; anonymisation is decided on a case-by-case basis on the instructions of judges
☐ Yes, personal data are systematically anonymised
X ☐ Yes, personal data are anonymised in accordance with an internal policy providing for targeted exceptions
☐ Other (please specify)

A.IV – Training and digital skills

14. Does your jurisdiction offer structured and regularly updated digital technology training courses for judges and staff?

If so, please specify which ones.

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There are recurring courses and digital materials available. New staff are assigned a tutor, who is tasked with, i.a. familiarising the new staff member with the most central digital tools. There is in-house IT staff available to offer support in IT matters.

A.V – Involvement of judges in digital transformation

15. To what extent are judges involved in decision-making and design processes relating to technological innovation and digital transformation in the judiciary? If applicable, please provide details.

As mentioned above, the National Courts Administration and the Legal Register Centre are responsible for the maintenance and development of the information systems of the courts. Judges and IT staff working at the courts are always involved in the design process related to technological innovation and digital transformation in the judiciary. The formal decision-making authority lies with the National Courts Administration and the Legal Register Centre when it comes to the purchase/acquisition of information systems.

A.VI – Use of AI systems in administrative justice

A.VI.1 – Tools and level of deployment

16. Are artificial intelligence systems currently used to assist in judicial or administrative activities?

No AI tools are currently in use. A tool for the automated anonymisation is being piloted and the deployment of a (commercial) generative AI assisted search service is being prepared.

16a. If so, which ones are used? (Please tick all that apply)

☐ Chatbots

☐ Semantic search tools

☐ Automated anonymisation of decisions

☐ Text analysis and assistance with legal research

☐ Tools to assist with organisation and court management

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☐ Other (please specify)

16b. Overall level of internal deployment of AI systems:

☐ Occasional or isolated use
X ☐ Trial phase
☐ Development phase
☐ Widespread use
☐ Full integration

Please explain if necessary:

A.VII – Governance, regulation and ethical framework for AI

A.VII.1 – Internal guidelines and regulatory compliance

17. Has your jurisdiction adopted any internal guidelines, charters or policies governing the use of AI systems, in particular in application of Regulation (EU) 2024/1689 (the AI Act), the GDPR and other relevant European instruments?

X ☐ YES

☐ NO

If so, please specify which ones.

Generative AI tools are not in use in the judiciary at the moment, although there are numerous initiatives and projects under way. The National Courts Administration is in the process of developing guidelines for the use of generative AI tools in the courts. The Legal Register Centre has produced guides on the ethical and safe use of AI for the judicial sector. There are also guidelines for government agencies, issued by the Finance Ministry.

18. Are AI systems subject to prior risk assessments?
X ☐ YES

☐ NO

If so, please specify the terms of these assessments

Risk assessment is conducted in accordance with national and EU regulations.

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For the courts, there is a specific procedure that must be fulfilled before generative AI tools can be taken into use (use meaning support functions, AI cannot be used in decision making), including the assessment of compliance with contractual requirements, and, in the case of high-risk AI systems, an evaluation of the impact of AI use. There is also always a security audit carried out by the Legal Register Center.

19. Are there specific requirements in terms of transparency for the use of AI systems? If so, please provide details.
As according to national and EU regulations.

20. Is the use of AI systems accompanied by human oversight mechanisms?

X ☐ YES

☐ NO

If so, please provide details

21. Are specific methodologies implemented during the design, development and deployment of AI systems to ensure their traceability, reliability, integrity and accuracy? If so, please provide details.

Yes, although so far, we do not have AI systems* developed for the judicial sector in use, so experience is very limited.

*Rules based automated decision making is allowed, in accordance with rules established by law. In the broad sense of the definition, these systems rely on AI, however not "algorithmic" AI or generative AI.

A.VIII – Innovation, prospects and future needs

A.VIII.1 – Current innovation projects

22. Are there any innovation projects currently under way in the following areas? (please tick all that apply)

☐ Process automation
X ☐ System interoperability
X ☐ Modernisation of existing systems
X ☐ Advanced digital services for external users
☐ AI systems

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☐ Other (please specify)

There are ambitious plans and motivation to further digitize the judicial sector, however due to regulatory and financial constraints, progress is rather slow.

A.VIII.2 – Barriers to digital transformation

23 What do you consider to be the main barriers to the digital transformation of administrative justice? (please tick all that apply)

X ☐ Complexity of the regulatory framework
X ☐ Insufficient financial resources
☐ Lack of specialised human resources
X ☐ Organisational complexity
☐ Resistance to change and digital skills gap
X ☐ Cybersecurity risks and challenges
☐ Other (please specify)

A.VIII.3 – Investment priorities

24. What do you think should be the priority areas for investment over the next few years? (please tick all that apply)

X ☐ Modernisation of infrastructure
X ☐ Cybersecurity
X ☐ Training and skills development
X ☐ Deployment of AI systems
☐ Interoperability at European level
☐ Complete digitalisation of administrative procedures
☐ Other (please specify)

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25. Please describe one or more good practices in digitalisation that have been implemented or are planned within your jurisdiction.

The digitization of the administrative judicial process has been ongoing since 2019. The electronic case management system provides significant improvement, even though there are a number of technical challenges that remain.

Part B
Automated administrative decisions and judicial review

B.I – Automated administrative decisions: substantive legality and procedure

1. Are there provisions in your legal system that authorise public administrations to use digital or algorithmic technologies in the exercise of their powers?

X ☐ YES

☐ NO

As an initial note, we understand that "digital and algorithmic technologies" include both rule- based systems and systems that are based on generative AI.
In Finland, only rule-based systems are allowed in decision-making.

If so:

1.a. According to these provisions, what are the authorised tools and the objectives pursued by their use?

The Act on the Management of Public Administration Information contains provisions to ensure consistent and high-quality management of authorities' data assets, as well as secure processing to implement the principle of public access to information;
to enable the secure and efficient use of authorities' data assets so that an authority can perform its duties and provide services to administrative clients effectively and with high quality, in accordance with good governance; and to promote the interoperability of information systems and data repositories.

The Administrative Procedure Act lays down the conditions that, in addition to those provided elsewhere in the law, must be met for an authority to make a case-handling decision using automated data processing without the decision being reviewed and approved by a natural person.

An authority may automatically decide a matter that does not involve elements requiring case-by-case discretion, or for which the elements requiring case-by-case discretion have been assessed by an official or other case handler. The decision must be based on processing rules prepared in advance by a natural person to guide automated data processing, established on the basis of the applicable law and prior discretion.

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A prerequisite for automatic decision-making is that the natural person to whom the decision applies can, in all respects, request a correction free of charge through a rectification request or an equivalent request, which is handled by the authority that made the decision or by another authority belonging to the same data controller.

It must be stated in the administrative decision if the matter has been decided automatically, as well as information on where the deployment decision referred to in section 28 d of the Act on the Management of Public Administration Information can be accessed.

Automated decision-making is used i.a. in taxation and for certain social welfare subsidies.

The Act on Electronic Services and Communication in the Public Sector intends to improve the efficiency and speed of transactions, as well as information security, in administration, courts, and other judicial bodies, including enforcement, by promoting the use of electronic data transmission methods.

1.b. What types of acts can be adopted using these technologies?
In particular, is the use of algorithms permitted for the adoption of administrative decisions involving discretionary powers?

No, it is not permitted (see above).

2. Are there provisions in your legal system governing the design, deployment and use of artificial intelligence systems employed by public administrations?

Again, we understand that "artificial intelligence systems" refers to both rule-based systems and systems which include elements of generative AI.

X ☐ YES

☐ NO

If so,

2.a. what type of implementation measures are these? (for example, legislative or soft law):

The Act on the Supervision of Certain Artificial Intelligence Systems provides provisions that complement the AI Regulation.

With regard to automated decision-making there are provisions in the Act on the Management of Public Administration Information on the implementation and use of an

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automated decision-making procedure, which include provisions on the documentation of the division of responsibilities and processing rules, quality assurance, quality control and handling of error situations, decision on deployment, communication, use of data, and official liability of a public sector employee.

2.b. Is there an obligation for public administrations to inform the public or individuals about the use of AI systems?

Yes. (Article 50 of the AI Regulation).

Regarding automated decision-making the deployment decision must be made public: According to the Act on the Management of Public Administration Information the authority must publish the valid deployment decision on its website in a public network. The deployment decision must include at minimum: justifications showing the prerequisites for deployment and the applicable regulations; a list of the documents on which the deployment decision is based; the planned deployment date and the date the decision was made; information about the decision-maker; the authority's contact information, where additional information about the use of the automated decision-making procedure can be obtained.

2.c. Are any authorities or bodies responsible for developing general rules or standards for the use of artificial intelligence within public administrations?

There is no authority or body with this specific mandate, but the Ministry of Finance has developed ethical guidelines for the use of (generative) AI in public administration, in addition to which authorities have produced sector specific guidelines.

Regarding rule based- systems and automated decision-making, the deployment process is laid down in law (see above).

3. What conditions must be met to ensure the legality of administrative procedures involving the use of artificial intelligence systems?

See above. Regarding automated decision-making and rule- based systems, provisions are laid down in law.

Generative AI systems are not currently allowed by law in administrative decision-making.

In particular:

3.a. Is the decision-making administration required to indicate the type of algorithmic system used and its principal characteristics?

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See above, the deployment decision must be made public, but that does not include the principal characteristics of the system.

3.b. At what stage of the procedure must the administration provide information about the use of an algorithmic system and its characteristics?

It must be indicated in the administrative decision if the matter has been resolved automatically, as well as information on where the deployment decision referred to in the Act on the Management of Public Administration Information can be accessed.

3.c. Does the interested party have the opportunity to comment on or challenge the use or operation of the AI system before the final decision is made?

No.

4. Are specific areas of administrative law in your country subject to express authorisation for the use of administrative decisions based on artificial intelligence systems?

No, the rules are general and apply to all fields of administrative law.

5. Are there specific areas of administrative law in which the use of artificial intelligence systems for issuing administrative decisions is expressly prohibited?

No, the rules are general. Rule-based systems are allowed under the conditions set in law. However, the prohibition of the use of automated decision-making in matters requiring case-by-case discretion in practice limits the use of AI systems to certain fields/types of matters (used e.g. in certain tax matters and matters involving social subsidies).

Generative AI systems are not allowed in any field of administrative law. Automated decision making can only rely on rule-based systems.

B.II – Judicial review of automated administrative decisions

6. Does national case-law recognise the legality of automated administrative decisions?

☐ YES

☐ NO

Please explain if necessary:

N/A
There is no case law on the matter. Automated administrative decisions are permitted under the conditions set out in the Administrative Procedure Act (see above).

If so:

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6.a. What principles and conditions have been identified by national case-law as necessary for these decisions to be legally valid?

6.b. Have any limitations been identified with regard to the possibility of delegating the administration's decision-making power to algorithmic systems?

6.c. In particular, which of the following principles must be respected, according to national case-law, when adopting an automated administrative decision? (Please tick all that apply)

☐ Principle of transparency
☐ Principle of non-exclusivity of human intervention ('human in the loop')
☐ Principle of non-discrimination
☐ Principle of knowledge and comprehensibility of algorithmic functioning
☐ Principle of attributing the decision to an authority vested with power
☐ Other (please specify)

7. Has national case-law ruled on the nature and legal classification of the algorithm or AI system used for administrative decision-making?

8. What are the limits of the judicial review that administrative judges can exercise over automated administrative decisions?

Automated administrative decisions do not differ from other administrative decisions in this regard.

9. According to national case-law, is the right of access to the algorithmic process that led to the automated administrative decision recognised?

☐ YES
☐ NO

If so:
9.a. What information relating to the AI system (data, logic, key parameters) must be made available to the party concerned?

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Part C
Administrative judges and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, in light of Regulation (EU) 2024/1689 (the 'AI Act') and other European Union standards and regulations, such as the GDPR, the DSA, the DMA, etc.

1. Does your country recognise, at constitutional level, principles that expressly refer to the use of artificial intelligence in the performance of judicial functions?

☐ YES

X ☐ NO

If so, please specify which ones

2. Has your country adopted or is it in the process of adopting national measures to implement Regulation (EU) 2024/1689 (the AI Act) concerning the use of artificial intelligence to support judicial decision-making, which is classified as a 'high-risk' activity (Annex III, point 8(a))?

☐ YES

X ☐ NO

If so:

2.a. What is the nature of these measures (legislative, regulatory, guidelines, soft-law instruments)?

The Act on the Supervision of Certain Artificial Intelligence Systems provides provisions that complement the AI Regulation. However, there are no measures specific to judicial decision-making.

2.b. For what purposes is the use of AI permitted? (Please tick all that apply)

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☐ Research and interpretation of the law

☐ Research and assessment of the facts

☐ Application of the law to a specific factual situation

☐ Administrative activities that are purely ancillary (recital 61 of Regulation (EU) 2024/1689)

Please explain if necessary:

2.c. What measures are taken to ensure human oversight (Article 14 of Regulation (EU) 2024/1689)? In particular, under what conditions is the user able to ignore, cancel or override the result produced by the artificial intelligence system (Article 14(4)(d) of the AI Act), or to suspend or interrupt its use (Article 14(4)(d) of the AI Act)?

2.d. What regulatory measures have been adopted to ensure the transparency, accuracy and robustness of the artificial intelligence system used (Articles 13 and 15 of Regulation (EU) 2024/1689 – the AI Act)?

3. Are there any official forms of testing or use of artificial intelligence systems for decision-making or generating judicial decisions currently in place in your country?

☐ YES

X ☐ NO

Please explain if necessary:

If so:

3.a What do they consist of?

3.b. What data sets are used?

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3.c. Is the software used publicly owned or provided by private operators?

3.d. Have any biases been identified in its operation? If so, what kind?

4. Are measures planned in your country to ensure a sufficient level of artificial intelligence literacy specifically for judges (Article 4 of Regulation (EU) 2024/1689)?
X ☐ YES

☐ NO

If so:

4.a. What do these measures consist of?

Training courses and digital materials.

4.b. Is specific training planned to prevent or limit the phenomenon known as 'automation bias' (Article 14(4)(b) of the AI Act)?

☐ YES

X ☐ NO

Please explain if necessary:

As the use of generative AI tools for judicial decision making is not envisaged in the near future, specific training events on this matter would be premature.

5. Is the use of generative or agentic artificial intelligence systems permitted in your country to assist in the drafting of procedural documents or court decisions?

No.

To help you understand the question better: **generative artificial intelligence (AI)** is a category of AI models which, thanks to machine learning and training on vast amounts of data, are capable of creating original content (text, images, videos, music, etc.). **Agentic AI** is described as a system capable of autonomously planning, making decisions and executing complex tasks with minimal human intervention to achieve a defined objective [source: OECD].

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6. Has the national case law of your country addressed issues concerning the interpretation and application of EU Regulation 2024/1689?

☐ YES

X ☐ NO

Please explain if necessary:

6.a. If yes, which principles have been established?

7. Have national courts of your country submitted preliminary rulings to the Court of Justice of the European Union regarding EU Regulation 2024/1689?

☐ YES

X ☐ NO

Please explain if necessary:

7.a. If yes, which questions were referred? What answers has the Court of Justice of the European Union provided?

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