

REPLIES AND ADDITIONAL INFORMATION SUBMITTED BY THE GOVERNMENT OF FINLAND 25 August 2025

Reform of the wellbeing services

The reform of wellbeing services counties has been a big one. The transfer from municipality-based system into establishing a new level of administration with the state guidance has been a very complicated reform. After two years of implementation, many things have been arranged to better overall control, mostly because there are fewer units sharing complex responsibilities. For public, the implementation phase has been shown as a highly complex one, compared to the more familiar former system — with its peculiar problems, like democracy deficit. Actually, it seems that at the service level, counties are doing very well, and citizens are served with important services and the bottlenecks to services are examined and solved, and digital services are going on faster than before. At the hospital and health center level, in service delivery there are no new problems: the system is working as it should.

The crisis talk is very much about the finance, not so much of services. Service network adaptations, because of population change and tight finance, have also taken much public attention, but with the population change these solutions are inevitable. There are differences in realities between counties, and inside the counties as well, but the system is working with problems perceived, with better co-operation of different actors and institutions.

The finance model for the reform is highly complicated and evolving. Its elements linked with the evaluation of service needs are currently under developing with the Finnish Institute for Health and Welfare (THL) and will be reported in due course, with the aim of updating the model. The question of taxation right was politically decided to be too complex for the start of the reform. Currently, counties very much focus on finding a balance for their economy, in co-operation with the Ministries of Social and Health, of the Interior and of Finance, and under their guidance in basic processes as well as some special processes linked with guaranteeing service level and investment needs. The legislation defines counties economy the time for balancing their deficits for next years. After the post reform special procedures are over, perhaps the question of taxation right will be back on discussion. Nevertheless, the current system aims to find a balance between services, finance and democracy – to quarantee key citizen services for the elderly, the youth and persons with disabilities, and to secure their right to say and be heard in different councils defined by the law.

What percent of tax revenue is allocated to persons with disabilities?

The changing demographic structure in Finland cause also challenges to arrange care for persons with disabilities. For example, elderly parents can no longer care their children at home and alternative arrangements are needed, suitable housing and flexible co-habiting premises — all which are costly compared to childhood home based alternative. Wellbeing service counties have taken this responsibility and are finding local solutions to housing needs (social housing). In some areas, there is some months queue to these services and the issue can be tackled in co-operation with other counties as well. It is possible to make complaints



to the Regional State Administration Agency, which work in co-operation with counties. These services should be arranged by tax income. The social services have noted that the tight economy and high unemployment have also increased some social problems. It is important to work locally to find solutions to these, and councils for persons with disabilities are the right bodies to help in this co-operation. The premises for health and social services are currently under negotiations between counties and municipalities. It is important that the quality level of these premises is adequate for needs.

Report on violence against women with disabilities by the Finnish Institute for Health and Welfare

The project page of the study in English is available here.

The final report of the project can be found <u>here</u>. The report is in Finnish, but the summary is in English.

Housing services in general and children's right to live at home or in a small group home

In practice, persons with disabilities live in their own homes in a rental or ownership-based manner. Services can be brought to their homes in the normal housing stock. Housing support and personal assistance can also be arranged for group housing. Even when a person receives, for example, 24-hour housing services in a housing unit (*i.e.* a group-based housing unit), he or she has his or her own dwelling in the unit, which includes toilet and cooking possibilities.

For some people, group housing is related to some stage of their lives, for example when moving away from their childhood home. Some people also wish to live in group-based units. In addition to housing support (regardless of the implementation method), persons with disabilities have the right to receive other services (including, coaching, personal assistance, special support for inclusion, support for mobility, supported decision-making).

A person/child with disabilities has a subjective right to services referred to in the Disability Services Act, such as housing allowance. The wellbeing services county must organise these services regardless of the sufficiency of appropriations.

In Finland, persons with disabilities can receive both disability services and Kela's support (*i.e.* they are not mutually exclusive).

Health care payment ceiling

Client fees in public health care include a calendar-year payment ceiling. From the beginning of 2025, the payment ceiling is EUR 762. When the payment ceiling is exceeded, the services are free of charge. A person aged 18 or over may also be charged a maintenance fee for short-term institutional care and services, such as inpatient treatment at a hospital or health centre, after the payment ceiling has been reached.

Medicines have an annual deductible. This means the maximum sum a person pays for medicines during the year. The annual deductible includes medicinal products included in the



reimbursement system prescribed on prescription for the treatment of an illness. Once the annual deductible has been met, the person will only pay a deductible of EUR 2.50 for each prescription medicine you buy for the remainder of the year.

Rehabilitation

In Finland, rehabilitation is organised and compensated by 21 wellbeing services counties, the City of Helsinki, the hospital District of Helsinki and Uusimaa and the region of Åland, as well as the Social Insurance institution of Finland (Kela), employment pension institutions, accident insurance companies and motor liability insurance companies.

Different service paths have been developed for clients' different rehabilitation needs, the purpose of which is individual and needs-based rehabilitation for all persons with disabilities. Here you can read about different forms of rehabilitation in English: https://stm.fi/en/rehabilitation

The process starts with a referral from a physician or drawing up a rehabilitation plan. An individual rehabilitation plan guides the client's rehabilitation. The main responsibility for drawing up rehabilitation plans rests with the wellbeing services counties, the City of Helsinki and the joint county authority for the hospital District of Helsinki and Uusimaa, as well as the region of Åland. The amount, duration and timing of rehabilitation will be scaled in accordance with the objectives and the rehabilitation client's resources. The aim is to promote the functional capacity and work ability of a rehabilitating person when they have deteriorated due to an illness or disability. The amount or intensity of rehabilitation may change as the objectives and need for rehabilitation change. The rehabilitation plan serves as a channel of information between different actors, and its implementation is monitored and evaluated.

Private service providers (number of service providers offices)

Nutrition therapy	82
Speech therapy	224
Occupational therapy	244
Psychotherapy	831
Neuropsychological rehabilitation	29
Foot therapy	73
Physiotherapy	1141

Self-employed persons

Nutrition therapy	160
Speech therapy	601
Occupational therapy	551
Psychotherapy	3852
Neuropsychological rehabilitation	41
Foot therapy	198
Physiotherapy	3532



And in the public sector, the above-mentioned services are provided by the wellbeing services counties, the City of Helsinki and the joint county authority for the hospital District of Helsinki and Uusimaa.

Social security

The statutory assessment of the adequacy of basic social security is carried out at four-year intervals at the end of each electoral term. However, the Finnish Institute for Health and Welfare also published an interim evaluation on 3 April 2025, which examines the changes in 2024 and 2025. According to the study, income has decreased most in households with children and in which the adults of the family receive labour market support or basic unemployment allowance. In addition to index freezes and cuts in housing allowance, it is estimated that the abolition of child increases in unemployment security will have a major impact on the above-mentioned changes in income levels. In summary, if social assistance is not available for some reason, cuts in social security will significantly reduce income. If social assistance is granted, it may compensate for the losses as a whole or at least to some extent.

A government plan to support generational exchange of knowledge of leaders of persons with disabilities

A national action plan on the UNCRPD is prepared for each Government term. Action plan defines the objectives and measures that will be taken to promote the implementation of the Convention in different administrative branches during each government term.

In addition to the public social and health care services, funding is granted for organisations of persons with disabilities.

The Funding Centre for Social Welfare and Health Organisations (STEA) is a state-aid authority that is responsible for the preparation, payment, monitoring, and impact evaluation of funds granted to social and health organisations. STEA assists organisations of persons with disabilities in their activities, for example in areas that promote inclusion, organisations' advocacy, such as influencing legislation and services, and promoting the rights of target groups at the national, regional and local level.

Safeguarding and monitoring the treatment of persons with disabilities in prisons

According to the Imprisonment Act, all prisoners shall be treated with justice and respect for their human dignity, and prisoners must not be discriminated against based on their state of health or disability. The Prison and Probation Service (RISE) is committed to safeguarding fundamental and human rights, treating sentenced people humanely, appropriately and equally, observing legality in all activities, as well as enforcing sentences in a way that supports the sentenced persons' individual growth and development and their aspiration to lead a life without crime. The legality of the activities of RISE, its units and staff is supervised by Parliamentary Ombudsman as well as other independent mechanisms, such as the Ombudsman for Equality and the Data Protection Ombudsman. Health and medical care



provided by prisoners' health care services is supervised by the Regional State Administrative Agency for Northern Finland.

Persons with disabilities are always placed in cells intended for them. In new prisons, a certain number of cells is accessible, including toilets and sanitary facilities. The aim is that persons with disabilities should be able to move around in other prison premises and outdoor recreation areas as well. However, in practice, it may be challenging to access all prison activities in older prisons buildings. Prisoners using sign language or requiring interpretation services due to a disability are provided with the necessary interpretation and translation services.

Työkanava Ltd

The Government decided to terminate the funding of Työkanava Ltd and dissolve the company in 2024. The company had employed only 17 persons with disabilities. Almost all of them had a fixed-term employment contract that ended already before the company's final termination.

Support measures to persons with mental health problems

The TE Services 2024 reform transferred TE Services to municipalities beginning on 1 January 2025.

Municipalities have now the autonomy to decide for themselves, for example, what kinds of services and support measures they offer to people with mental health problems. The Act on organising of employment lays down services and support measures that municipalities are responsible to organize, but it's up to the municipalities to decide how these measures will ultimately be implemented.

Employment Service Statistics

According to the Employment Service Statistics of the Ministry of Economic Affairs and Employment, there were around 35,000 unemployed jobseekers with disabilities or long-term illnesses in June 2025. In the long term, since 2010, the figure has fallen from 40,000.

At the EU level, data on the employment of persons with disabilities have been collected through the EU's SILC data. According to this, the difference between the employment rate of persons with disabilities and non-disabilities was 19 percentage points in Finland in 2023. Finland ranks eighth in the EU comparison.

Statistics Finland collected data on the employment of persons with disabilities in 2022. According to the Labour force Survey, there were around 593,000 employed persons in Finland who felt that an illness or disability restricted their activities. This is 23% of all employed persons. The labour force participation rate of persons with disabilities, that is, the proportion of employed persons and unemployed persons in the labour market among the population aged 15 to 64, was 73% for persons with disabilities (all 80%).



Accessible transport

When developing accessible services, decentralization can enable the creation of individualized regional solutions. In Finland, there have been several projects aimed at improving accessibility in the services of specific providers or within certain regions. For example, the "Smart Mobility for All" (FILKA) project is developing innovation and pilot environments related to accessibility in the cities of Riihimäki and Forssa. Another example is from city of Espoo, where is an ongoing project that maps the accessibility of bus stops using a mobile game, which encourages residents to participate in data collection. Based on the collected data, accessibility deviations and areas for improvement are identified and prioritized for planning enhancement measures.

If these or other regional concepts prove effective, they can serve as models for organizing accessibility on a national level. Centralization of accessibility information is however important. By improving the interoperability and availability of accessibility information, users gain insight into the accessibility solutions they can expect from different service providers. Providing accessibility information is also required under EU law.

Implementation of the European Accessibility Act within the transportation network

By making use of existing national legislation, the obligations of the Directive were expanded or clarified to cover, in accordance with the directive, the passenger transport services referred to in the so-called EU passenger rights regulations (air transport, maritime and inland waterway transport, rail transport, and bus transport). The requirements apply to digital services offered to consumers as part of transport services and their accessibility (including websites, mobile applications, electronic tickets, and electronic travel ticket services), as well as information provided to passengers in electronic format regarding the accessibility of passenger transport services.

Availability of accessible housing

According to estimation by the Ministry of the Environment, in 2025 approximately 24 percent of the housing stock (3,3 million dwellings) meet the general national accessibility requirements.

Housing for persons with special needs is partly produced with government support. In this case, the project plans are approved by the Centre for State-Subsidized Housing Construction. The Centre also requires the use of an accessibility coordinator in the project. The coordinator is to give a final report to the Centre.

The government support is usually based on the combination of interest subsidy loan with deficiency guarantee and direct investment grant to cover the self-financing share.

Due to state budget cuts, the direct investment grants were diminished from 2025 on, to 15 million euros per year (in 2024 the amount was 63 million euros). The remaining investment grants will be allocated for the housing of people with disabilities and homeless people. Therefore, the budget cut concerns mostly the housing of elderly people and students, which



has represented 81 percent of the investment grants in the last twenty years. Prime Minister Petteri Orpo's government policy is to allocate the government support for housing production primarily for persons with the most difficulties in finding housing in open market.

Teacher qualifications

In Finland, teacher qualifications are monitored through the teacher data collection, which was most recently carried out in 2019. According to the data, there were 3,712 special education teachers and special class teachers, of whom 3,354 – that is, 90.4% – were formally qualified. There are regional differences in qualifications. In Uusimaa, 83% of special education teachers or special class teachers were qualified. The next round of teacher data collection will take place at the end of this year.

In basic education, special education teachers work either as special education teachers within mainstream education or as special class teachers, where pupils receive instruction in special classes. In 2024, approximately 3,100 pupils out of about 533,000 basic education pupils studied in special schools. Their instruction, as well as teaching in special classes within other basic education schools, is provided by a sufficient number of special class teachers. Within mainstream education, special education teaching is primarily delivered by special education teachers.

In general, upper secondary education and vocational education and training, there are no separate special education groups; instead, students requiring special support study together with other students in the same groups. Special education teachers work in close collaboration with other teachers, providing consultative support to their teaching so that students receive the assistance they need. In addition, special education teachers support students requiring special support individually, in workshops, or by acting as co-teachers.

Up-to-date statistical data on the distribution of special education teachers and special class teachers is not available.

Special education teachers

In recent years, the number of special education teachers completing their training has increased, as training targets for special education teachers have been raised both in university agreements and through earmarked funding for teacher education. In 2024, a total of 504 special education teachers graduated from universities (for early childhood education, pre-primary and basic education), and 150 graduated from vocational special needs teacher training programmes. These numbers are sufficient to meet the demand for special education teachers, including the replacement of those retiring.

Effects of new decentralization measures as well as budgetary cuts on education

Support for learning and participation in education has been strengthened through legislative reforms in early childhood education (in force since 2022), pre-primary and basic education (entering into force on 1 August 2025), general upper secondary education (1 August 2025), and vocational education and training (1 August 2026). The new legislation ensures that



children and students receive support at an early enough stage. The implementation of the legislation is funded by permanent annual additional appropriations (€97 million for preprimary and basic education, €10 million for general upper secondary education, and €10 million for vocational education and training). The additional funding can be used, for example, to provide remedial instruction, reduce group sizes, and hire more special education teachers. Implementation is also supported by the national core curricula and supplementary materials prepared by the Finnish National Agency for Education. The reform of support in pre-primary and basic education and its impacts are being monitored through a research project.

Case concerning Helsinki University's digital platform

Higher education institutions are autonomous actors, and they are responsible for the accessibility of their premises, information and communications. ensuring the accessibility of their physical premises, digital information, and communication practices. Higher education institutions have drawn up their own accessibility plans based on instructions issued by the Ministry of Education and Culture the accessibility plan for higher education and higher education institutions published in 2021.

In vocational education and training, accessibility is regarded as a means of ensuring equality for students and as an element of educational inclusion, referring to the equal participation of all students in education and learning. Particular attention has been paid in vocational special education institutions to pedagogical accessibility, attitudinal, psychological and social accessibility, accessible interaction, accessibility of facilities and the learning environment, as well as the usability of information technology. Students with a wide range of disabilities or chronic illnesses also require various accessible facilities, tools, materials and learning environments. Any support needs of the student or special arrangements required in student admissions must not become an obstacle to accessing education or completing studies.

Remedial recourses for students with disabilities who experience barriers in post-secondary education

In Finland, students in higher education who have a disability or functional limitation can apply for individual study arrangements, such as special accommodations for exams or teaching. These are requested through the student's own university.

If a student faces discrimination in student admissions, the primary measure is an appeal: first, a request for rectification is submitted to the university, and thereafter, if necessary, the case can be taken to an administrative court. Through this process, the outcome of the admission decision may be changed. Independently of this process, an individual may also bring a discrimination case before the Non-Discrimination and Equality Tribunal. If the Tribunal finds discrimination, it may recommend compensation to the person who has experienced it.



Independent oversight mechanism

Higher education institutions are responsible for the arrangements within the framework of their autonomy. Any appeal is addressed to the institution. A student also has the possibility to lodge a complaint with the Non-Discrimination Ombudsman.

In vocational education and training, a decision made by the education provider may be appealed to the Regional State Administrative Agency (as of 1 January 2026, to the new Licensing and Supervisory Agency) if the matter concerns the duration of preparatory education for work and independent living, admission of a student, special support or the adjustment of competence assessment, or derogations from vocational skill requirements or learning objectives.

In general, upper secondary education, under the General Upper Secondary Schools Act, it is likewise possible to request rectification from the Regional State Administrative Agency in matters such as student admission, exceptional arrangements for studies, and the right to receive special needs education.

Teacher education

Higher education institutions enjoy freedom of research, science, art and tuition. They are responsible for the education they provide, including teacher education, and have autonomy regarding the content of degrees and curricula.

Outcome of the case

The official supervision concerning the University of Helsinki's information system is still ongoing, and no further information can be provided at this stage.

Statistics on children with disabilities

Due to the sensitive nature of health-related data, information on disabilities is not collected in statistics. Consequently, it is not possible to produce education-related data disaggregated by type of disability.

Support measures in pre-primary and basic education

The implementation of support measures in pre-primary and basic education is monitored through national data collection. In addition, the reform of the regulation on learning and school attendance support and the core curriculum in pre-primary and basic education was preceded by separate studies on the implementation of support and the functioning of the support system. Based on these studies, it can be concluded that different forms of support were available at all levels of support, but there was regional variation in their implementation.

In general, upper secondary education and vocational education and training, the support received by students has varied depending on the education provider, although overall it has



been provided fairly well. With the comprehensive reform of learning support in general upper secondary and vocational education, the support for learning and special needs education provided to students will be strengthened. The legislation in general upper secondary education entered into force on 1 August 2025, and in vocational education and training it will enter into force on 1 August 2026.

Education for deaf and deafblind children

In the past, education for deaf and deafblind children was provided in state-run special schools. This segregated form of education provision was discontinued when the state special schools were merged into the Valteri Centre for Learning and Consulting. Valteri still provides placements for pupils with the most demanding support needs, including deafblind children. The centre also has expertise to support local schools in matters related to the education of deafblind children and produces learning materials that are suitable for different types of support needs arising from various disabilities. In the future, pupil placements at Valteri School will primarily be temporary, with the aim of supporting a return to the child's local school. Support periods for pupils are also organised, along with guidance services provided directly to local schools.

The new consultative hospital education service, which complements Finland's long-established hospital education system that safeguards the education of children receiving specialised medical care, will also operate as a "resource centre." It will provide support directly to local schools and pre-primary units, helping to strengthen their expertise and capacity to meet support needs related to specialised medical care — needs that are also visible in schooling. This service is particularly important in sparsely populated areas, where pupils may find it difficult to travel to a dedicated hospital school placement.

A few vocational special education institutions have specific expertise in the education of deafblind students, ensuring that they receive the support they need. These institutions also strengthen the capacity of other education providers to organise special support in ways that meet the needs of students.

A Programme for Equity and Non-Discrimination in Education and Training

The Ministry of Education and Culture has launched a Programme for Equity and Non-Discrimination in Education and Training. The programme aims to strengthen competence, the knowledge base, and inclusion in matters of equality and non-discrimination across all levels of education and training. Among other measures, the programme will provide continuing education to enhance the competence of actors in the education and training sector in particular.

The Programme for Equity and Non-Discrimination in Education and Training was prepared as part of the Government's statement to Parliament on promoting equality, gender equality, and non-discrimination in Finnish society. The programme was published on 28 May 2025, and its measures will be implemented during 2025–2027. An appropriation of €480,000 has been allocated to the programme.



Åland Islands

According to section 18, subsection 1 of the Autonomous Government Act (1144/1991), the county has legislative powers in matters concerning public order and security with the exceptions provided in section 27, paragraphs 27, 34 and 35, and fire and rescue services. Rescue services legislation is therefore within the competence of the Åland Regional Government. Civil defence and civil defence shelters, according to section 27, subsection 1, paragraph 28 of the autonomy Act, are under the mainland Finland's legislative powers; however, a decision on the evacuation of persons residing in a county to a location outside the county may be made only with the consent of the county's administration.

The provisions of Chapter 10 of the Rescue Act (379/2011) on civil defence preparedness in rescue services also apply in Åland Islands. However, in accordance with section 64 of the Rescue Act, the rescue authorities of Åland Island are responsible for the rescue authorities' responsibility for civil defence and for the cooperation referred to in section 65. Åland Islands follows national preparedness planning related to population protection.

The provisions of Chapter 11 of the Rescue Act on civil defence shelters also apply to Åland Islands. Civil defence shelters are built in Åland Islands in the same way as on the continent, and the construction is carried out in accordance with the Government Decree on Civil Defence shelters (408/2011), the Government Decree on Civil Defence equipment and equipment (409/2011) and the Ministry of the Interior Decree on the Technical requirements of Civil Defence shelters and the maintenance of Civil Defence shelter equipment (506/2011).

The Government Administration of Åland Islands is responsible for coordinating civil defence preparations and arrangements concerning the Åland Islands.

The Emergency response Centre Administration and the Landskaps Ålarmcentrale in Åland Islands work together, but the Act on Emergency response Centre operations (692/2010) does not apply to Åland Islands.

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