

FINLAND

SUBMISSION TO THE UN COMMITTEE ON THE RIGHTS OF PERSONS WITH DISABILITIES

33RD SESSION, 11 – 29 AUGUST 2025

Amnesty International submits this briefing in advance of the examination of Finland by the Committee on the Rights of Persons with Disabilities (CRPD) during its 33rd session from 11 to 29 August 2025. In this document, Amnesty International sets out its concerns about the implementation of the Convention on the Rights of Persons with Disabilities (the Convention) by Finland, with a focus on the right to health (Article 25), the right to live independently and be included in the community (Article 19), the right to adequate standard of living and social protection (Article 28), and the right to participation in political and public life (Article 29).

1. RIGHT TO HEALTH (ARTICLE 25) AND RIGHT TO LIVE INDEPENDENTLY AND BE INCLUDED IN THE COMMUNITY (ARTICLE 19)

In 2023, the Advisory Board for the Rights of Persons with Disabilities commissioned a study from the University of Helsinki that examined the realization of human rights of persons with disabilities in Finland.¹ According to an online survey in the study that sought to examine how the rights of persons with disabilities are realized in daily life, a majority of respondents – who were people with disabilities – experienced either problems in accessing rehabilitation (40 % of respondents) or uncertainty in accessing rehabilitation (21 % of respondents).² Barriers in access identified by respondents included: excessive bureaucracy, physical inaccessibility, and high staff turnover in rehabilitation services.

In March 2025, Prime Minister Orpo's government announced plans to cut EUR 20 million from services for people with disabilities,³ with further information of how these cuts will be implemented yet to be publicized. The government has put in place numerous cuts that have a negative effect on social services, health services and social security provision with the stated aim of improving public finances and reducing state debt.⁴

Prime Minister Petteri Orpo's government has also raised out-of-pocket healthcare costs several times during the government's term, that started in 2023. According to a report by the Finnish Ministry for Health and Social Services, the rising cost of accessing healthcare, which includes fees to access healthcare services and medicine costs, affect people with disabilities as they use public healthcare services and medications more often than the general population.⁵ In 2024,

¹ The study included an online survey for people with disabilities with 541 respondents (70 % of respondents were persons with disabilities and 30 % of respondents assisted a person with disabilities or a family member of a person with disabilities in submitting responses) and group interviews with 41 persons with disabilities. Hisayo Katsui et al., 2023, ['Uncertain and changing participation – a briefing on the realisation of human rights in the everyday life of persons with disabilities'] Epävarmuutta ja vaihtelevaa osallisuutta - Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa (in Finnish), University of Helsinki, [www.tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf](https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf)

² Katsui et al, 2023, p. 71.

³ Yle, 27 March 2025, 'Government targets child protection, disability services and home care for extra spending cuts', www.yle.fi/a/74-20152319, accessed 25 April 2025.

⁴ Finnish Government, 20 June 2023, A strong and committed Finland - Programme of Prime Minister Petteri Orpo's Government, www.julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government-20062023.pdf?sequence=4&isAllowed=y.

⁵ Finnish Ministry for Health and Social Services, 23 September 2024, ['The joint impact of social security and social and healthcare services changes in 2024 and 2025 on the realization of constitutional and human rights of different groups'] Vuosien 2024 ja 2025 toimeentuloturva- ja sosiaali- ja terveystalouden sääntöjen muutosten yhteisvaikutukset eri ihmisryhmien perus- ja ihmisoikeuksien toteutumiseen p. 4.

the government put in place a 10 % inflationary raise to client fees collected from patients to access healthcare and social services across the board for all population groups?⁶ and in 2025 most primary healthcare fees, such as fees for primary healthcare doctors' appointments, were further raised by 22.5 % and specialised healthcare fees by 45 %.⁷ The government also raised the annual maximum limit on out-of-pocket medicine costs in 2024.⁸ In 2025, the initial deductible of medicine costs, that is the amount of medicine expenses that must be paid out of pocket before receiving any reimbursements, was raised.⁹ Furthermore, the tax rate for medicines was raised from 10 % to 14 % in 2025.¹⁰ All in all, these changes mean that out-of-pocket expenses for health care by healthcare users have risen considerably during the current government term. These changes impact especially low-income people with disabilities, since they use more social and healthcare services than the general population.¹¹

According to Prime Minister Orpo's Government programme for 2023–2027, the government plans to restrict access to healthcare for irregular or undocumented migrants to urgent care only.¹² Under current legislation, irregular or undocumented migrants have access to non-urgent care that is deemed necessary by healthcare personnel, in addition to urgent care. Legislation ensuring access to necessary non-urgent care came into effect in 2023.¹³ According to the government's draft legislative proposal, published on 17 December 2024, irregular or undocumented migrants, including those who are persons with disabilities would, as a rule, only be entitled to urgent care, and access to non-urgent care (including assistive products for persons with disabilities) would only be available in "isolated cases".¹⁴

RECOMMENDATIONS TO THE FINNISH GOVERNMENT:

- Ensure access to rehabilitation and health care for all persons with disabilities.
- Ensure that costs are not a barrier for people with disabilities to access health care, including client fees and the price of medicines, particularly for people on lower incomes with disabilities. Ensure that the maximum limit on out-of-pocket medicine costs and the initial deductible on reimbursements of medicine costs do not create financial barriers for people with disabilities to access medicine.
- Ensure that people with disabilities who are irregular or undocumented migrants have access to necessary non-urgent and urgent healthcare services in all cases, not only "isolated cases", including any assistive products they need.

⁶ Finnish Government, 23 November 2023, 'Maximum client fees in healthcare and social welfare to increase by 10 per cent', www.valtioneuvosto.fi/-/1271139/sosiaali-ja-terveydenhuollon-asiakasmaksujen-enimmaismaarat-nousevat-10-prosenttia?languageId=en_US, accessed 25 April 2025.

⁷ Yle, 3 October 2024, ['The government raises healthcare fees: a visit to the health centre can cost this much'] 'Hallitus nostaa maksuja terveydenhuollossa: näin paljon käynti terveyskeskuksessa voi maksaa', www.yle.fi/a/74-20114489 (in Finnish), accessed 25 April 2025.

⁸ The maximum limit of annual costs was raised from EUR 592.16 to EUR 626.94. Finnish Social Security Authority Kela, 24 November 2023, 'The annual maximum limit on out-of-pocket medicine costs will be increased in 2024', www.kela.fi/news/the-annual-maximum-limit-on-out-of-pocket-medicine-costs-will-be-increased-in-2024, accessed 25 April 2025.

⁹ The initial deductible was raised from EUR 50 to EUR 70. Finnish Social Security Authority Kela, 5 December 2024, 'The initial deductible on prescription drug reimbursements will change, affecting medication costs for many', www.kela.fi/news/the-initial-deductible-on-prescription-drug-reimbursements-will-change-affecting-medication-costs-for-many, accessed 25 April 2025.

¹⁰ Yle, 31 December 2024, '10 changes impacting your wallet in 2025', <https://yle.fi/a/74-20134297>, accessed 25 April 2025.

¹¹ Finnish Ministry for Health and Social Services, 23 September 2024, ['The joint impact of social security and social and healthcare services changes in 2024 and 2025 on the realization of constitutional and human rights of different groups'] Vuosien 2024 ja 2025 toimeentuloturva- ja sosiaali- ja terveyspalvelulainsäädännön muutosten yhteisvaikutukset eri ihmisryhmien perus- ja ihmisoikeuksien toteutumiseen, p. 38.

¹² Finnish Government, 20 June 2023, A strong and committed Finland - Programme of Prime Minister Petteri Orpo's Government, www.julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government-20062023.pdf?sequence=4&isAllowed=y, p. 223.

¹³ European Observatory on Health Systems and Policies, 31 May 2023, Extension to the undocumented migrants' right to health care, www.euro.who.int/en/observatory/monitors/health-systems-monitor/updates/hspm/finland-2019/extension-to-the-undocumented-migrants-right-to-health-care, accessed 28 April 2025.

¹⁴ Finnish Government, 17 December 2024, [Draft legislative proposal concerning healthcare provision for undocumented migrants] Luonnos HE eduskunnalle laeiksi sosiaali- ja terveydenhuollon järjestämisestä annetun lain ja rajat ylittävistä terveydenhuollosta annetun lain 20 §:n muuttamisesta (in Finnish), www.lausuntopalvelu.fi/FI/Proposal/DownloadProposalAttachment?proposalId=a8d1d2b4-3f80-45ae-bb8d-d823d6a277e0&attachmentId=23858, p. 19.

2. RIGHT TO ADEQUATE STANDARD OF LIVING AND SOCIAL PROTECTION (ARTICLE 28)

Amnesty International and the Finnish League for Human Rights have previously underscored that the government is not collecting enough data on how the right to an adequate standard of living and social protection are realized for people with disabilities and several other groups who are marginalized and at risk of discrimination.¹⁵

The income of persons with disabilities in Finland is typically comprised of several social security benefits they receive simultaneously.¹⁶ The government does not collect adequate data on how many persons with disabilities receive income from employment, but approximately less than one in five persons with disabilities are employed, according to a Finnish study.¹⁷ The lack of data is a notable concern as it poses a barrier to addressing some of the issues that people with disabilities face, including access to employment.

Therefore, some of the most important sources of income for persons with disabilities are social security benefits, including disability allowances and disability pensions.¹⁸ In 2024, 263,476 persons received disability allowances.¹⁹ Persons who receive disability allowances receive social assistance, which is a last-resort form of financial assistance²⁰, more commonly than the general population.²¹ About one third of disability allowances recipients also receive housing allowance and nearly 60% of working-age people who receive disability allowances also receive housing allowance.²²

According to the 2023 University of Helsinki study on the realization of human rights of persons with disabilities referenced in section 1.1., 55.8 % of surveyed persons with disabilities experienced occasional or sustained problems with having enough disposable income to cover living costs.²³ Only one in ten respondents thought that the rights to an adequate standard of living and social security of persons with disabilities are realized in Finland.²⁴ Some of the main financial issues faced by persons with disabilities that were mentioned by survey respondents included: inadequate financial support for persons with disabilities, difficulties meeting the additional costs related to disability, high inflation, complex bureaucracy in applying for benefits and being denied a disability allowance.²⁵

Since 2023, the government of Prime Minister Orpo has put in place significant austerity measures, including cuts to social spending and social security benefits. Amnesty International published a report in April 2025 on the effects of the austerity measures on the right to adequate housing.²⁶ In the report, Amnesty International found that the austerity measures, including cuts to social security benefits, have increased homelessness and inadequate housing for people on lower incomes. While Prime Minister Orpo's government has not introduced cuts to disability allowances and pensions, cuts to several other benefits affect persons with disabilities. Cuts have been introduced to unemployment benefits, rehabilitation allowance for young persons, allowance payable during vocational rehabilitation and general housing allowance, and an index freeze has been introduced to most benefits.²⁷ All of these would impact people living with disabilities who receive these benefits and allowances.

According to an assessment of the impact of changes made in social security benefits for 2024 and 2025, the income of approximately 18% of disability allowance and disability pension recipients decreased by at least 5% primarily due to cuts

¹⁵ Amnesty International and the Finnish League for Human Rights, 2021, "I Live under constant duress and in a state of emergency": Inadequate social security in Finland (EUR 20/4804/2021), 31 August 2021, www.amnesty.org/en/documents/eur20/4804/2021/en/

¹⁶ Finnish Social Security Authority Kela, 28 February 2022, ['Recipients of disability allowances receive social assistance more often than the general public'] 'Vammaisetuksien saajat saavat selvästi muuta väestöä yleisemmin perustoimeentulotukea' (in Finnish)

www.tietotarjotin.fi/tutkimusblogi/721376/vammaisetuksien-saajat-saavat-selvasti-muuta-vaestoa-yleisemmin-perustoimeentulotukea, accessed 23 April 2025.

¹⁷ Antti Teittinen, 2015, ['Why are persons with disabilities marginalized from working life? A structural point of view'] 'Miksi vammaiset syrjäytyvät työelämästä? Rakenteellinen näkökulma' (in Finnish). In: Joel Kivirauma (ed.): *Vammaisten elämä. Suomen Vammaistutkimuksen Seuran 3. vuosikirja*.

¹⁸ Finnish Social Security Authority Kela, 28 February 2022.

¹⁹ Finnish Social Security Authority Kela, Statistical Information Service, 23 April 2025.

²⁰ For more information about social assistance, please see: Finnish Ministry for Social Affairs and Health, undated, 'Social assistance', www.stm.fi/en/income-security/social-assistance, accessed 26 May 2025.

²¹ Finnish Social Security Authority Kela, 28 February 2022.

²² Finnish Social Security Authority Kela, 28 February 2022.

²³ Katsui et al, 2023, p. 81.

²⁴ Katsui et al, 2023, p. 82.

²⁵ Katsui et al, 2023, p. 83-84.

²⁶ Amnesty International, 2025, "I have to choose whether to buy food or pay my rent": the impact of austerity measures on the right to adequate housing in Finland (EUR 20/9219/2025), 14 April 2025, www.amnesty.org/en/documents/eur20/9219/2025/en/

²⁷ Index freezes, that mean that benefit provision levels do not rise along with rises in costs of living, have been introduced for 2024-2027 for minimum rates of the maternity, paternity and parental allowance and of the special care allowance, study grants, the housing allowance for pensioners, minimum amounts of sickness allowance and rehabilitation allowance as well as unemployment benefits. Finnish Social Security Authority Kela, 20 December 2023, 'Changes to Kela benefits in 2024', <https://www.kela.fi/news/changes-to-kela-benefits-in-2024>; Finnish Social Security Authority Kela, 27 December 2024, 'Changes to Kela benefits in 2024', www.kela.fi/news/how-kela-benefits-will-change-in-2025#changes-to-unemployment-benefits-in-2025, accessed 24 April 2025.

made to housing allowance and unemployment benefits.²⁸ Since persons with disabilities often receive social security benefits long-term, the negative impact of social protection cuts accumulate to them over a long period of time and intensify the negative impact.²⁹

It should be noted that the provision level of social security benefits was deemed inadequate by international monitoring bodies even before the cuts introduced by Prime Minister Orpo's government. In 2021, the Committee on Economic, Social and Cultural Rights (CESCR) noted that previous cuts during the 2015-2019 government term had rendered benefits inadequate and had disproportionately affected groups that had already been disadvantaged.³⁰ The European Committee on Social Rights (ECSR) published a decision in 2023 stating that the inadequate provision level of several social security benefits are in violation of the European Social Charter.³¹ Amnesty International and the Finnish League for Human Rights have also published a 2021 joint report on the inadequate provision level of social security benefits in Finland.³²

Prime Minister Orpo's government has announced plans to further introduce cuts to social security, including cuts and restrictions to the means-tested social assistance which is meant to be a last-resort benefit to ensure at minimum income.³³

RECOMMENDATIONS TO THE FINNISH GOVERNMENT:

- Improve the availability of disaggregated data on the employment rates of persons with disabilities and what financial stresses persons with disabilities may experience.
- Remove the index freeze on social security benefits to ensure that benefit provision levels do not lag behind rising living costs. Ensure that cuts to social security benefits, including cuts to rehabilitation allowance for young persons, allowance payable during vocational rehabilitation and general housing allowance, do not result in retrogressions to people's right to an adequate standard of living. Refrain from cutting social assistance, as this would amount to an unjustified retrogression to the progressive realization of the right to adequate standard of living and social protection.

3. RIGHT TO PARTICIPATION IN POLITICAL AND PUBLIC LIFE (ARTICLE 29)

The Chancellor of Justice noted in a 2024 decision that ministries had given exceptionally short time periods for submitting remarks on draft government proposals during 2023, especially for draft legislative proposals concerning social protection and social and healthcare services.³⁴ According to the Chancellor of Justice, due to too short periods for submitting remarks, the minimum requirements for ensuring participation in drafting legislation was not realized. According to the guide for drafting legislation, the minimum time period for submitting remarks on draft legislative proposals during an open consultation process should be six weeks and eight weeks for larger legislative projects.³⁵ Amnesty International Finland notes that there were several instances where time periods for submitting remarks were considerably shorter, even less than two weeks³⁶.

²⁸ Finnish Ministry Health and Social Affairs, 23 September 2024, ['The joint impact of 2024 and 2025 social security changes on the economic position of households'] Vuosien 2024 ja 2025 sosiaaliturvamuutosten yhteisvaikutukset kotitalouksien taloudelliseen asemaan (in Finnish), www.stm.fi/documents/1271139/198978037/Yhteisvaikutukset+kotitalouksien+taloudelliseen+asemaan.pdf/8faeab99-e198-0ec0-0382-88bf718bcbcd/Yhteisvaikutukset+kotitalouksien+taloudelliseen+asemaan.pdf?t=1727089437080, p. 26.

²⁹ Finnish Government, 2023, ['Government legislative proposal on freezing indexes on certain social security benefits'] Hallituksen esitys eduskunnalle laiksi eräiden kansaneläkeindeksiin ja elinkustannusindeksiin sidottujen etuuksien ja rahamäärien indeksitarkistuksista vuosina 2024–2027 ja siihen liittyviksi laeiksi sekä lapsilisälain 7 §:n muuttamisesta, www.eduskunta.fi/FI/vaski/HallituksenEsitys/Documents/HE_75+2023.pdf (in Finnish), p. 33.

³⁰ Committee on Economic, Social and Cultural Rights, 30 March 2021, E/C.12/FIN/CO/7, Para. 27.

³¹ European Committee on Economic and Social Rights, 15 February 2023, Decision on the merits: Finnish Society of Social Rights v. Finland, Complaint No. 172/2018.

³² Amnesty International and the Finnish League for Human Rights, 2021, "I Live under constant duress and in a state of emergency" (previously cited).

³³ Finnish Government, 20 June 2023, A strong and committed Finland: Programme of Prime Minister Petteri Orpo's Government, www.julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165044/Programme-of-Prime-Minister-Petteri-Orpos-Government-20062023.pdf?sequence=4, pp. 77-79;

³⁴ Chancellor of Justice, 29 January 2024, ['The ''] Säätölakien kuulemisaika oli liian lyhyt ja vaikutusten arviointi puutteellista, www.oikeuskansleri.fi/-/saastolakien-kuulemisaika-oli-liian-lyhyt-ja-vaikutusten-arviointi-puutteellista (In Finnish).

³⁵ Finnish Government, Säädösalvaston kuulemisopas - Ohje kuulemiseen säädösalvaston prosessissa, www.kuulemisopas.finlex.fi/ohje/kuulemisohje/#jakso-1-9-lausuntoaika (in Finnish), accessed 28 April 2025.

³⁶ For instance, in 2023, the time period for submitting remarks on the draft legislative proposal on proposed cuts to general housing allowance in 2023 was two weeks and for proposed freeze in the index raises of most social security benefits, the time period was less than 1,5 week.

The UN Convention on the Rights of Persons with Disabilities requires that, when drafting and implementing legislation or policies that concern persons with disabilities, persons with disabilities must be actively engaged in decision-making processes. This obligation is recognised in the Finnish government's 'Guidelines for Impact Assessment in Law Drafting', which states that "[i]t is essential to engage disability organisations in the assessment of the impacts [of laws] on persons with disabilities".³⁷ Several non-governmental organisations by persons with disabilities have noted that a statement was not requested from them on draft legislative proposals that impact persons with disabilities. One example of such a draft legislative proposal concerned proposed cuts to general housing allowance. In their submitted remarks to the Ministry for Social Affairs and Health, the Finnish Association of People with Physical Disabilities and the Finnish Federation of the Visually Impaired noted critically, that no organisation by persons with disabilities had received a request to give a statement on the draft proposal.³⁸

Prime Minister Orpo's government has implemented cuts to the funding of social and healthcare non-governmental organisations, including non-governmental organisations by persons with disabilities. In 2024, the government funded non-governmental organisations working in the field of health and social affairs by EUR 383 million. Due to funding cuts, the funding amount for organizations working in the field of health and social affairs, including organisations working with and for persons with disabilities for 2025 is EUR 303 million, in 2026 it is EUR 278 million and in 2027 it is only EUR 252 million.³⁹ In April 2025, the government decided on an additional EUR 10 million funding cut for non-governmental organisations working in the field of health and social affairs.⁴⁰ These amount to a considerable reduction in funding targeting non-governmental organisations, including organisations by persons with disabilities that provide services for persons with disabilities and advocate for the realization of the rights of persons with disabilities. At the end of the current government term, the cuts will amount to over one third of the funding level in 2024.

RECOMMENDATIONS TO THE FINNISH GOVERNMENT:

- Ensure adequate and genuine participation of persons with disabilities in decision-making that has an impact on persons with disabilities. In practice, ensure adequate representation of persons with disabilities in planning processes that impact persons with disabilities and that processes are accessible for people with disabilities. Ensure that time periods for giving statements on government proposals are adequate and that thorough impact assessments of the impact of proposed legislative changes on persons with disabilities in line with national guidelines.
- Conduct impact assessments of the proposed cuts to the funding of non-governmental organizations, including non-governmental organisations of persons with disabilities that provide services for persons with disabilities and advocate for the realization of the rights of persons with disabilities, to ensure that these cuts do not compromise the rights of persons with disabilities.

³⁷ Finnish Government, 8 May 2023, Guidelines for Impact Assessment in Law Drafting, www.julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164932/VN_2023_53.pdf?sequence=1&isAllowed=y, p. 79.

³⁸ Statements to the draft government proposal on changing the law on general housing allowance, www.lausuntopalvelu.fi/FI/Proposal/Participation?proposallid=2c691220-a64d-431c-9df8-289941ab950d# (in Finnish), pp. 234, 306.

³⁹ Funding Centre for Social Welfare and Health Organisations STEA, 18 April 2024, Mitä leikataan ja keneltä?, www.stea.fi/tietoa-steasta/ajankohtaiset-koontisivu/blogit/mita-leikataan-ja-kenelta/ (in Finnish), accessed 28 April 2025.

⁴⁰ Finnish Government, 23 April 2025, Orpon hallitus: Riippuvuudet vahvistavat Suomen kilpailukykyä ja turvallisuutta, www.valtioneuvosto.fi/-/orpon-hallitus-riippuvuudet-vahvistavat-suomen-kilpailukyky-ja-turvallisuutta-1 (in Finnish), accessed 28 April 2025.