EUROPEAN DISABILITY FORUM

with support from Google.org

Finland

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Introduction

This collection of country reports is part of the research on Digital Skills, Accommodation and Technological Assistance for Employment, conducted by the European Disability Forum (EDF) with the support of Google.org.

The aim of the study is to explore the situation of persons with disabilities in the open labour market, focusing in particular on the potential of digital skills training and the use of accessible and assistive technologies to foster inclusion in the workplace.

National experts from each EU Member State (with the exception of Luxembourg) and the UK analysed their respective national contexts. They outline policies and programmes to support reasonable accommodation as a Human Resources (HR) procedure, map trends in the use of accessible and assistive technologies in the workplace, and explain the main limitations experienced by employees with disabilities in acquiring accessible or assistive technology that meets their needs. They also analysed the barriers faced by persons with disabilities related to digital skills and highlight some good practices at national level.

The national reports cover the following countries: the UK, Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden. Luxemburg is the only EU Member State that is not part of the study due to not finding a suitable national expert on the topic.

Glossary

Assistive devices: external devices that are designed, made, or adapted to assist a person to perform a particular task. Many people with disabilities depend on assistive devices to enable them to carry out daily activities and participate actively and productively in community or professional life.

Assistive technology: any item, piece of equipment, service or product system including software that is used to increase, maintain, substitute or improve functional capabilities of persons with disabilities or for, alleviation and compensation of impairments, activity limitations or participation restrictions.

Disability allowance: payments that persons with disabilities can receive from the State to cover basic living costs and services.

Discrimination: any distinction, exclusion or restriction on the basis of one or several grounds (sex, race, disability, sexual orientation, gender identity, etc.) that damages or nullifies the recognition, enjoyment or exercise of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field, on an equal basis with others.

European Union (EU): a unique economic and political union between 27 European countries, as it stands at the time of publication of this report.

EU Statistics on Income and Living Conditions (EU-SILC): a regular cross-sectional and longitudinal sample survey by Eurostat that provides data on income, poverty, social exclusion and living conditions in the European Union.

General Comment: a General Comment is a treaty body's interpretation of human rights treaty provisions, thematic issues or its methods of work. General Comments often seek to clarify the reporting duties of State Parties with respect to certain treaty provisions and suggest approaches to implementing those provisions.

Member State(s) (of the EU): the EU currently consists of 27 countries, also called "Member States". Each Member State is party to the founding treaties of the European Union and is therefore subject to the privileges and obligations of membership. Unlike members of most international organisations, the Member States of the EU are subject to binding laws in exchange for their representation within the common legislative and judicial institutions.

Number of observations (n): indicates the number of employers each national expert managed to interview.

Open labour market: this refers to work in a mainstream or "regular" employment setting, as opposed to a setting that has been created specifically to employ a specific group of employees, such as persons with disabilities.

Organisations of Persons with Disabilities (OPD): represent the interests of their members with disabilities and have the mandate to advocate for the realisation of their human rights and lobby for the consideration of their interests.

Percentage points: this term expresses the arithmetic difference of two percentages, whereas percent (%) refers to the rate of change. For example, if Country A has an employment rate of 30% and Country B has an employment rate of 60%, Country B's employment rate is 30 percentage points higher than Country A's but is also higher by 100%.

Persons with disabilities: individuals who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.

Reasonable accommodation: the necessary and appropriate modification and adjustments, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms. To be "reasonable", the accommodation cannot impose a disproportionate or undue burden. Denial of reasonable accommodation is a form of discrimination.

The Digital Economy and Society Index (DESI): an index that the European Commission reports between 2014-2022, monitoring Europe's overall digital performance and tracks the progress of EU countries in their digital competitiveness.

United Nations Convention on the Rights of Persons with Disabilities (CRPD): an international human rights treaty that reaffirms that all persons with disabilities must enjoy all human rights and fundamental freedoms. The CRPD clarifies that all persons with disabilities have the right to participate in the civil, political, economic, social and cultural life of the community in the same way as anyone else.

National Overview

The recent disability gap in Finland is 19%[1]. Finland does not have official statistics on the number of people with disabilities within the labour force or on the main characteristics of unemployment among people with disabilities. There are some estimates on how many people with disabilities are in the labour market. For example, an estimate from 2013 indicated that 15-20% of Finnish people with disabilities were employed[2]. The Finnish Federation of the Visually Impaired has estimated that 24% of persons with visual disabilities aged 15 to 64 are fully employed, 16% are partially employed, and 3% are unemployed[3]. Out of 25,000 working-age people with intellectual and developmental disabilities, only 600 are employed in the open labour market and receive a salary[4]. Many people with intellectual and developmental disabilities work in integrated workshops, a social service that is not considered employment[5]. Moreover, the Finnish labour market heavily favours people without disabilities over those with disabilities[6].

In a report commissioned by the Ministry of Economic Affairs and Employment, Kyröläinen found structural barriers to entry into the workforce for people with disabilities[7]. The barriers are multifaceted and include the lack of personal assistance, the lack of accessibility in work environments, and a 'pension trap', meaning that people with disabilities are hesitant to seek work in fear of losing their disability pension. A person with a disability can earn a salary of up to €922.42 per month while also receiving the disability pension. When the salary exceeds the upper limit, one has to either suspend the pension for up to two years or give up the right to the disability pension altogether, and the decision cannot be reversed. It is an either-or situation where one must choose between a considerable cut in income or completely giving up the pension[8]. The Finnish government has tried to address these structural barriers by setting up a state-owned company, Työkanava Ltd, in 2022. The company employs those with impaired capacity to work and those who are most difficult to employ, including people with disabilities[9]. Työkanava Ltd was founded in response to a report commissioned by the Ministry of Economic Affairs and Employment in 2021 on the Finnish model for employing people with partial work ability[10]. In public discourse, the trend seems to be that people with disabilities are rarely the sole focus but are rather discussed as part of a broader population, such as long-term unemployed people.

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Organisations for people with disabilities (hereafter, OPDs) agree that both fixed-term employment and reasonable adjustments are difficult to attain, and that people with disabilities face discrimination in recruitment. There have been national programmes, such as the Paikka auki programme (Vacant Job programme), to help them join the labour force, though the organisations have very little information on whether the programme has been successful. The chances of employment increase with higher education and having work experience during youth and studies. However, traditional entry-level jobs and summer jobs might not be accessible, which further affects the chances of employment.

Digital Skills

Finland is one of the leading countries in terms of digital skills, with 79.18% of individuals having basic or above basic overall digital skills in 2022, compared to the EU average of 53.92%[11]. Finland ranked first among the EU states in the Digital Economy and Society Index in 2022, scoring 69.6, well above the European average of 52.3[12]. The Finnish Ministry of Finance in 2020 found that most of their digital skills survey respondents can use services and devices independently and can guide other users. Lack of technological infrastructure and financial resources to purchase the necessary equipment, inability to use the equipment, and insufficient digital skills and expertise of individuals are found to be barriers to digital inclusion[13]. It has been noted that the motivation to learn new digital skills is the key factor in adopting new skills and digital inclusion[14]. Katsui and Valkama[15], however, point out that people with disabilities do not have equal access to digital training in their education, despite the legal framework of the Non-Discrimination Act (1325/2014)[16] and the Constitution of Finland (731/1999)[17].

To strengthen media literacy, information and communication technologies (ICT), and programming skills from youth, the Ministry of Education and Culture has launched the new literacy development project as part of the 'Right to Learn' programme. There are multiple digital training courses for citizens that are partly funded by the government, which offer help to navigate digital platforms[18]. The Ministry of Education and Culture also funds community colleges that offer various digital skills courses. Lifelong learning has long been an important aspect of the Finnish education system. The educational infrastructure is designed with flexibility, allowing citizens to continue and supplement their educational paths at any level and at any point in their lives. Community colleges are a good forum for discovering individual learning paths, and Open University offers courses aligned with university degree programmes, with attendance not requiring prior diploma studies[19]. Finnish employers also promote lifelong learning opportunities by supporting employees to be trained further within their employment. Learning can take different forms, from tailor-made adult education to courses by organisations, often paid for by the employers[20].

The vast majority of companies in the EDF survey have less than 1% of employees with disabilities. Companies seem to have a positive preconception of hiring interns with disabilities: 66.66% of companies (n=21) answered that they have hired or considered hiring interns with disabilities; 90.47% considered that having interns with disabilities would help in hiring employees with disabilities

in the future. This seems to be because there are fewer risks and investments associated with having interns. The expectations towards interns with disabilities do not differ from those without disabilities: good social and communication skills, expertise for their assigned tasks and high motivation to work are all important. Digital skills were seen as crucial for interns with disabilities but not necessarily for employees with disabilities, as the companies often provide digital skills training for their employees (80.95%). The different expectations imply that employers presume people with disabilities are one homogenous group with relatively low capability to acquire digital skills, while they are heterogeneous with multiple types of capabilities.

The companies think that Finnish employment services (hereafter TE-services) have a narrow range of job-matching channels and lack variety in career routes for people with disabilities. The fast-paced recruiting processes are not accessible, as the disability services are too rigid[21]. The companies find it difficult to match tasks with employees with disabilities, especially when the work environment is dangerous, such as on construction sites. Moreover, the companies internally have very general guidelines for hiring employees or interns with disabilities and little knowledge on how to participate in governmental actions for equality at work, although the majority of the companies (61.9%) were aware of their existence. Companies expect interns with disabilities to seek them out and to know the existing frameworks provided by the TE-services or their universities.

The OPDs believe that employment is still far from their reference groups' realities, and there is a lack of guidance on digital skills to break through the status quo. The situation worsened with the digital surge during the COVID-19 pandemic, which led to many activities being done remotely. This has been difficult for people with disabilities in terms of participation. The OPDs are optimistic that the threshold for acquiring digital skills will be lowered with better access to high-quality yet low-cost assistive technology, particularly for people with visual impairments. However, there is concern over full digital accessibility since not all digital interfaces are coded to accommodate assistive technology. General technological developments such as smartphones and applications can help people with disabilities, but barriers still exist, with limited channels to learn new skills and economic resources to obtain digital devices. The OPDs provide digital skills counselling to their reference groups to learn to use assistive technology when they receive it as a form of rehabilitation from the National Pension Institute (KELA) or digital training to teach the basic functions of a phone/digital device in a way that suits the reference group best. The organisations call for more targeted digital education that keeps pace with the group of people with disabilities concerned.

Assistive Technologies

Assistive technology is largely provided as part of medical rehabilitation in Finland. If it is to be used for work, it is acquired by the employer, TE-services or KELA as professional rehabilitation. Financially demanding aid is mostly provided by KELA[22]. There is no available national research on the use of assistive technology in employment or trends in using it. However, Kyröläinen states that people with disabilities face obstacles in acquiring assistive devices at many stages: from assessing the need to obtaining them[23]. The wait time for assistive technology can be long both for initial acquisition and repair, which naturally implies that acquisition for work purposes can also be very challenging. OPDs have similarly observed the poor acquisition rate and the lack of replacement devices during maintenance. On this basis, the organisations suggested that with the lower acquisition rate, it is difficult to prove how effectively assistive technology serves people with disabilities, which in turn makes it difficult to persuade employers that assistive technology is a productive investment.

Neither Finnish employers nor OPDs have ample knowledge about assistive technology and its real-life usage by people with disabilities at work, since it is so vast and bespoke, sometimes involving serious technologies. Only 23.8% of companies (n=21) are aware of the use of assistive technology by employees with disabilities, but they rarely know how many employees with disabilities use what type of assistive technology at work. 28.57% of companies responded that they have policies implementing support for the acquisition and use of assistive technology by employees with disabilities, but considering that companies either have 1-2 employees using assistive technology or no people with disabilities at work at all, it is highly unlikely that the policies are frequently applied. At workplaces, there are very simple/basic assistive technologies and devices available for employees with disabilities such as keyboards and bigger screens, which are (seemingly) for those with mild physical disabilities or reduced work abilities rather than severe disabilities. It is fair to say that the use of assistive technology at work remains in the realm of providing better ergonomic workstations. Very few companies (14.28%) are aware of the public legal framework and/or programmes supporting assistive technology acquisition. There seems to be no incentive to find out about these unless the need arises. Employers often build their knowledge on how to acquire assistive technology and what kind of devices their workers use from the firsthand experience of attaining it. It is crucial to note that people with disabilities themselves first initiate action and request assistive technology, which is then to be discussed and approved by higher management. However, it is worth noting that public

support for assistive technology acquisition does not cover general needs for ergonomic comfort, while this seems to be the main practice in workplaces regarding assistive technology.

OPDs pointed out that assistive technology is rapidly developing, and legally mandated accessibility has improved in recent years, but practice is not quite there. They urged that creating an accessible environment, both online and offline, should come first. However, they added that accessibility or having assistive technology does not automatically guarantee actual usability and practicality. People with disabilities should be able to actually utilise the technology and make the most out of accessible environments.

Reasonable Accommodation

In Finland, an employer with over 30 regular employees is legally required to have a non-discrimination plan to promote equality. The Non-Discrimination Act (1325/2014) states that denying reasonable accommodation constitutes discrimination[24]. Upon the reform of the Act in 2023, employers must reassess their hiring policies and non-discrimination plans, and include non-discrimination conclusions, such as decisions on why a person was denied reasonable accommodations. The reassessment must be done within two years of the law reform[25]. According to the Employment Contracts Act, disability cannot be viewed as a valid termination of employment contract if the person's work abilities have not decreased substantially or permanently so that the person is unable to perform their tasks[26]. If a person with a disability is discriminated against, they have the right to receive compensation. Employers are required to provide occupational health care to increase the working ability of their employees, including employees with disabilities[27].

In the survey, 54.17% (n=21) of employees answered that their company has a policy regarding the accessibility of recruitment processes. Municipalities' employment departments and TE-services offer support to businesses and organisations for reasonable accommodation reimbursements of up to €4000 per employee. TE-services can also compensate for assistance by another employee for up to 20 hours/month for 18 months. Persons with partial work ability can find work via TE-services' work ability coordinator, and their service is also available to employers[28]. Various organisations such as the Finnish National Institute for Welfare and Health (THL), the VATES Foundation, the Finnish Association on Intellectual and Developmental Disabilities, and the Ministry of Social Affairs and Health publish handbooks on disability services for employment and employment activities, which can also guide employers to existing services[29]. These services are very underused. In fact, 76.19% of employers are not aware of the legal framework and/or public programmes supporting the provision of reasonable accommodation in the workplace for employees with disabilities. The fact that reasonable accommodation is not spelled out as a standardised procedure in HR policies in most workplaces (66.67%) may have contributed to the low record of utilising the public support systems.

Most companies make case-by-case decisions at higher management levels. Finding the right work tasks and adjusting them (i.e., adjusting work time and environments) are the main forms of accommodation in workplaces. Other

types of reasonable accommodation include general level changes, which do not cause much extra expense for companies, such as making the physical environment more accessible for people with disabilities by using tactile floors, widening doors or pathways. The changes in the environment are in line with the Building Act (132/1999), which requires buildings to be accessible for people with disabilities[30]. It is apparent from the examples that most employees who need assistive technology or reasonable accommodation do not have severe disabilities and their needs can easily be met with the slightest adjustments. Some companies answered that their reasonable accommodation is to better accommodate existing employees with partial working ability on their return to work.

Employers seem to be less concerned about inaccessible environments, and more about expenses, efficiency of the work, and productivity. Even when they consider inaccessible environments seriously, companies worry about the direct and indirect costs of reasonable adjustments in the working environment. Examples include the cost of having a personal assistant or workmate for an employee with disabilities, working overtime, and possible diminished returns from work, and not being able to utilise employees with disabilities to substitute for other workers in their absence. The lack of experience working with people with disabilities, and the subsequent lack of knowledge on how to navigate arranging reasonable accommodation for people with disabilities, seemingly contribute to hesitation to act on the part of employers.

OPDs remarked that technical innovations and development expectations by employers, and the realities of employees with disabilities are so far apart that they feel like two different worlds. According to the organisations, people with disabilities are marginalised in using and benefiting from more advanced assistive technology and digital accessibility. Additionally, the organisations state that the challenges arise from societal prejudices, insufficient access to and use of digital technologies for reasonable accommodations, lack of knowledge about reasonable accommodations, and little cooperation between employers and government bodies. People with disabilities can be in very unequal positions depending on who is paying for assistive technology. State officials are slow to react to the need for assistive devices, and access may be altogether denied or taken away upon reassessment of the need. The officials may work with limited knowledge of what people with disabilities need to be able to work, and assistive technologies can be deemed too expensive. The implementation of practices is not flexible enough, and a person may not be allowed to have

two pieces of the same assistive devices and technology that they could use at work and at home. This can be a barrier to entering work life. These are very substantial forms of isolation for their reference groups, according to the OPDs. There should be more understanding that a person has individual needs for assistive technology in different environments and, quoting one OPD, "getting help shouldn't be too difficult".

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