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Implementation of the European Social Charter in Finland

NHRI observations on the Government report of 2025

This document contains observations by the Finnish Human Rights Centre (HRC¹, NHRI) to the 19th National Report on the implementation of the European Social Charter (2025) by the Government of Finland.

Should you have any further questions or need for additional information, do not hesitate to contact us at leena.leikas@parliament.fi.

The document can be published on the committee's website.

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¹ The Human Rights Centre represents the Finnish National Human Rights Institution (NHRI) in international NHRI cooperation and other international and European cooperation in human rights.

The NHRI comprises the Human Rights Centre, its pluralistic 39-member Human Rights Delegation, and the Office of the Parliamentary Ombudsman. The institution complies with the UN Paris Principles and the Global Alliance of NHRIs (GANHRI) accredited it with A-status in 2014, 2019 and 2025.

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Employment and persons with disabilities

Lack of policy measures

1. The government lacks systematic policy measures to promote the participation of persons with disabilities in working life. Furthermore, it has not implemented any targeted and concrete policy measures to promote the right to work for persons with disabilities.
2. Finnish Human Rights Centre (FIN NHRI) is of the opinion that there is an urgent need to develop a national employment strategy and action plan for persons with disabilities, as well as carry out research into the barriers to employment faced by persons with disabilities to identify effective solutions.

Earnings related unemployment benefits

3. One specific issue of concern impacting persons with disabilities is the legislative change to the effect that wage-subsidised work – often facilitating access to the labour market for persons with disabilities – does not count towards the work requirement attached to granting of earnings-related unemployment allowance. That is, a person who has worked in wage-subsidised work for 12 months will not be granted earnings-related unemployment allowance, but a person who has worked the same job without wage-subsidy will be granted much higher earnings-related unemployment allowance.

Removal of protected portion of unemployment benefits

4. Another specific issue of concern impacting persons with disabilities is the removal of protected portion of unemployment benefits. This refers to the removal of a specific amount of earnings that unemployment benefits recipients used to be able to earn without it affecting their benefits. This was particularly important to persons with disabilities, because it improved their possibilities to accept parttime employments.

Persons with intellectual disabilities in labour market

5. With reference to the observation by the central employee organisations (paragraph 138 of the Government report) that labour exploitation typically affects workers in a vulnerable position, the FIN NHRI wishes to draw the Committee's attention to the situation of persons with intellectual disabilities in labour market.
6. According to the Finnish Association on Intellectual and Developmental Disabilities (Kehitysvammaliitto), there are approximately 30,000 working-age persons with intellectual disabilities in Finland. Of these, only around 500–600 are employed under a standard employment contract and receive a salary in accordance with collective agreements.
7. At the same time, approximately 6,000 persons with intellectual disabilities participate in work activities (*työtoiminta*) or activities supporting employment (*kuntouttava työtoiminta*), primarily organised in sheltered or segregated settings.
8. In addition, more than 2,300 persons are engaged in so-called community employment (*avotyötoiminta*). Community employment refers to work performed in ordinary workplaces without an employment contract, for which the wellbeing services county pays a daily allowance ranging from 0 to 12 euros.
9. As a result, persons with intellectual disabilities participating in community employment do not benefit from the principles of fair remuneration and equal pay for work of equal value, nor from the labour law protections attached to an employment relationship. This situation raises serious concerns from the perspective of equality, non-discrimination and the right to just and favourable conditions of work.

Participation in the open labour market

10. The FIN NHRI further emphasises that a significantly higher number of persons with disabilities – including persons with intellectual disabilities – could access ordinary salaried employment, if adequate and individualised support were made available and targeted policy measures were implemented. Individualised support includes job coaching and other measures provided within a supported employment framework.
11. In this regard, the FIN NHRI recalls that in its concluding observations adopted in 2025, the Committee on the Rights of Persons with Disabilities expressed concern about the low participation of persons with disabilities in the open labour market and urged the State party to strengthen measures promoting inclusive employment. The current situation of persons with intellectual disabilities in community employment demonstrates that these concerns remain highly relevant in Finland.

Social services and social security

Changes to Social Services Act

12. The government has proposed significant changes to the Social Services Act. These changes include restricting the right to appeal service decisions, which undermines social service clients' access to justice.
13. At the same time, the government proposes deregulation of social services and significant raises to client fees. These proposals combined will make it harder for clients to get the services they need and may have a negative effect on the realisation of their social rights.

Changes in social security legislation

14. During 2024 and 2025, the current Government has made a multitude of changes to social security and social and health services legislation. At the time of the changes, the human rights impact assessment was effectively not done with regard to different groups of people.
15. In 2024, after the fact, the Ministry of Social affairs and Health prepared a memorandum titled "The combined impact of changes in income security and social and health service legislation in 2024 and 2025 on the realization of fundamental and human rights of different groups of people".
16. The memorandum described the joint and cross-impacts arising from changes brought about by two or more government proposals, especially those affecting the same individuals and groups of people, from the perspective of human impact assessment and fundamental and human rights impact assessment.
17. The review included some legal amendments to income security and social services that had already entered into force in 2024, as well as the government proposals that were to be submitted to Parliament in autumn 2024 concerning social security and social and health services, as well as other budget-related proposals that were seen to have significant joint impacts.
18. The assessment was carried out by focusing on relevant perspectives for various groups of people. In accordance with the position of the Constitutional Law Committee (PeVL 51/2017 vp, p. 4), special attention was paid to those groups for whom the negative effects may be greatest. The assessment of the groups of people concerned
 - 1) the working-age population, i.e. the 18–64-year-old population, and of these, in particular the unemployed and those outside the working life, including students,
 - 2) children and families with children,
 - 3) persons with disabilities, and

4) pensioners.

The gender perspective, which is related to the above-mentioned groups of people, was also taken into consideration.

19. The draft laws and other proposals that were assessed from the administrative sector of the Ministry of Social Affairs and Health covered changes to unemployment security, general housing allowance, income support, child allowances, index-linked benefits, unemployment insurance contributions, pension benefits, sickness benefits, the availability and accessibility of public health services, pharmaceutical reimbursements, and services for children and young people. The individual proposals and draft laws were selected for assessment on the basis that they have a synergistic effect on one or more of the above-mentioned groups of people with one or more other proposed amendments.
20. The assessment focused on the obligation imposed on public authorities in Section 22 of the Constitution to ensure the implementation of fundamental and human rights, which often requires active action to create the conditions for the exercise of rights. Particularly important fundamental rights are the right to equality, guaranteed in Section 6 of the Constitution, and the right to social security, guaranteed in Section 19.
21. The human rights treaties that are key to the assessment include the UN International Covenant on Economic, Social and Cultural Rights and the European Social Charter. The UN Convention on the Rights of the Child and the UN Convention on the Rights of Persons with Disabilities were also examined.
22. Since there is no precise definition of the combined effects of legislation, thus there is no established method for their assessment. However, the impact assessment guidelines for legislative drafting recommend that such combined effects be taken into account and assessed which can result from different parallel projects or which accumulate in such a way that a later project reinforces the effects of an earlier one.
23. The assessment in question followed the three-step process of the Fundamental and Human Rights Impact Assessment Guide, which first identifies the rights and groups of people to be assessed, then maps out the relevant binding and non-binding sources of law, and finally assesses how the changes under review affect the realization of the rights of individuals and groups in everyday life compared to the current situation.
24. It was established that within all the different groups of people under examination, the most significant negative impacts of the changes were on those who are already in a vulnerable position, i.e. people with low incomes and who use public services a lot.
25. Many of the changes, such as easing the care guarantee, reducing the number of public healthcare providers and increasing customer fees, have similar

impacts on the realization of fundamental and human rights in all groups of people examined. In addition, impacts due to the specific characteristics of the groups of people were found.

26. Among the working-age group, the vulnerable group described above includes young adults, partially able-bodied people and the unemployed who find it difficult to find employment. Changes in social security benefits will weaken their livelihoods in particular, which may increase the use of social assistance. On the other hand, in the longer term, the effects can be compensated to some extent if more working-age people become employed.
27. Among families with children, the most at risk are single-parent families, for whom benefits are more important. The decline in income can lead to a buildup of problems, which can increase the risk of exclusion of children and young people.
28. Both the elderly and disabled use public healthcare services and medicines more than the rest of the population, so longer journeys to the emergency room, possible delays in accessing treatment and changes in the deductibles for pharmaceutical reimbursements affect them in particular.
29. The FIN NHRI notes that these assessments are made by a Government ministry and yet, all these changes took place, Government thus knowingly compounded negative effects on persons in vulnerable position.

Final notes

30. The unemployment rate is constantly rising (currently over 10 %, over 30.000 more unemployed persons than previous year). The poverty in families with children is increasing (almost 14 % of children, 137 000 children live in families with income less than 60 % of median income). The youth has difficulties finding even a part time employment (the number of unemployed persons under the age of 25 was 42.200, which is 13 % more than the previous year). Unemployment has increased in all age groups from previous year. Foreign citizens' unemployment rate is 20 % and almost 15 % of all unemployed persons are foreigners.
31. Furthermore, the Government has made it more difficult to change career paths, has cut student benefits and increased costs for services that are traditionally considered core of a Nordic welfare state. Homelessness is also increasing alarmingly: until 2023 the number of persons without fixed residence decreased continuously but since then it has risen, recently 20% from 2024 to 2025, amounting to close to 5000 persons. Overall, the trends in welfare and wellbeing in the society are rather negative.
