



Digitalisation and digital transformation in Finland

Implications for persons with disabilities

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Implications for persons with disabilities

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Contents

1	Executive summary	6
2	Are government strategies and plans on digitalisation and digital transformation disability-inclusive?	8
2.1	Disability inclusion in generic strategies on digitalisation and digital transformation.....	8
2.2	Disability inclusion in focused or sector-specific strategies on digitalisation and digital transformation	10
3	Do disability strategies address the potential of and challenges pertaining to digitalisation and digital transformation?	12
3.1	How digitalisation and digital transformation are addressed in the national disability strategy	12
3.2	How digitalisation and digital transformation are addressed in specific disability-related strategies	13
4	Promoting disability inclusion through funding, education and training	18
4.1	How funding promotes disability-inclusive digitalisation and digital transformation.....	18
4.2	How disability inclusion is promoted through the education and training of digital professionals	19
4.3	How digital inclusion and accessibility is addressed in the education and training of accessibility and inclusion professionals.....	19
4.4	How digital inclusion is addressed via the training of people with disabilities	19
5	The opportunities and challenges presented by digitalisation and digital transformation to the rights of persons with disabilities	22
5.1	The most significant opportunities presented by digitalisation and digital transformation for persons with disabilities	22
5.2	The most significant challenges faced by persons with disabilities in relation to digitalisation and digital transformation	22
6	Conclusions and recommendations	24
6.1	Conclusions	24
6.2	Recommendations.....	24
Annex 1	26

1 Executive summary

The Act on the Provision of Digital Services 306/2019 regulates the accessibility of digital services and implements the European Accessibility Act 2102/2016. In §2 of the Act, accessibility is defined as the principles and technical solutions that must be followed when planning, developing and implementing digital services to be accessible to users, especially to persons with disabilities. The current Finnish Government Programme acknowledges digitalisation as one objective. The Ministry of Finance established the Programme for the Promotion of Digitalisation on 25th February 2020. Different strategies and projects have been launched to implement the government programme.

The Act on the Provision of Digital Services 306/2019¹ regulates the accessibility of digital services and stipulates that, digital services must be accessible to users, especially persons with disabilities. All the actors defined in the Act must adhere to the legislation and ensure accessibility accordingly. The Government Programme² aims to increase the technological development and digitalisation of the public sector, and different programmes must be followed. The Government Programme is publicly financed. The Act on the Provision of Digital Services and they must be adhered to by all other programmes and strategies.

No national strategies address the implications of the transition to such technologies for persons with disabilities within their national priorities. The national strategies cover all citizens without specifying any particular groups. National strategies and recommendations must always adhere to legislation. These include the Non-discrimination Act 21/2004³ and the Act on the Provision of Digital Services 306/2019⁴ so that everyone is included. In addition, the second action programme of the UN CPRD 2020-2023⁵ refers to equal access to digital services for persons with and without disabilities.

It can be seen as positive that people are treated equally in the eyes of the law, and no special labels are needed. When not implemented in practice, this becomes a negative aspect. Changes related to digitalisation have enlarged the existing disparity and inequality between persons with and without disabilities and further those among persons with disabilities.

¹ Act on the Provision of Digital Services <https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

² Government Programme <https://valtioneuvosto.fi/en/marin/government-programme>.

³ Non-discrimination Act <https://www.finlex.fi/fi/laki/kaannokset/2004/en20040021>.

⁴ Act on the Provision of Digital Services <https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

⁵ Sosiaali- ja Terveysministeriö (Ministry of Social Affairs and Health). (2021) Oikeus osallisuuteen ja yhdenvertaisuuteen: YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallinen toimintaohjelma 2020-2023 (Right to participation and equality: CRPD national action programme 2020–2023). Publication series 2021:2 of the Ministry of Social Affairs and Health.

Good practices

The second national action programme of the UN Convention on the Rights of Persons with Disabilities between 2020 and 2023⁶ makes a number of references to digital services. The promotion of accessibility to websites for as many persons with disabilities as possible is one of the set goals.

The Act on the Provision of Digital Services 306/2019⁷ and its enforcement has been prepared thoroughly, and the public authorities provide advice and training.

Recommendations

- The Government needs a more systematic, deliberate strategy to specifically bring disability inclusion to the fore of the digitalisation and digital transformation process and avoid further increasing the existing disparity and inequality between persons with and without disabilities. Stronger political will and leadership to support disability inclusion is essential.
- Organisations of persons with disabilities and their expertise must be taken advantage of in the digitalisation process. When their needs are incorporated in planning of digital transformation from the onset, the final product of service is much more likely to be accessible for persons with disabilities.
- Any public funding for digitalisation and digital transformation needs to stipulate inequality reduction of the Sustainability Development Goal 10 as an integral part of the call. Reference to disability needs to be explicitly made as to the reduction of barriers to digital access and enabling transformation.
- The teaching curriculum of professionals who deal with the services for persons with disabilities systematically needs to include a compulsory disability-specific training module in which equal digital access for all including persons with disabilities should be taught.

⁶ Sosiaali- ja Terveysministeriö (Ministry of Social Affairs and Health). (2021) Oikeus osallisuuteen ja yhdenvertaisuuteen: YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallinen toimintaohjelma 2020-2023 (Right to participation and equality: CRPD national action programme 2020-2023). Publication series 2021:2 of the Ministry of Social Affairs and Health. https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162687/STM_2021_2_J.pdf?sequence=1&isAllowed=y.

⁷ Act on the Provision of Digital Services <https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

2 Are government strategies and plans on digitalisation and digital transformation disability-inclusive?

2.1 Disability inclusion in generic strategies on digitalisation and digital transformation

The Act on the Provision of Digital Services 306/2019⁸ regulates the accessibility of digital services and implements the European Accessibility Act 2102/2016.⁹ In Act § 2, accessibility is defined as the principles and technical solutions that must be followed when planning, developing and implementing digital services to be accessible to users, especially persons with disabilities. All the actors defined in the Act must adhere to the legislation and ensure accessibility accordingly.

One objective of the Finnish Government Programme¹⁰ is for Finland to be recognised as a frontrunner that develops and introduces new solutions enabled by digitalisation and technological advances across administrative and sectoral boundaries. The aim is to increase the technological abilities and the digitalisation of the public sector and promote cooperation between the public and private sectors. Digital services must be accessible, and support must be provided to ensure the equity of the services. Services must be available in the language spoken by the person. Persons with disabilities are not explicitly mentioned in this section on digitalisation. The Government Programme generally states that a socially sustainable welfare state is inclusive to people with disabilities and provides them with the same opportunities for an independent life, education and work. The programme is financed by the government budget and must adhere to the Act on the Provision of Digital Services 306/2019.¹¹ The legislative process starts¹² with the government's proposal which is publicly available for different actors to comment. This proposal was open for comments at lausunto.fi website during 18.1. – 1.3.2018 and it received 135 comments from municipalities, service providers and several disability associations f.ex. Invalidiliitto ry (The Finnish Association of People with Physical Disabilities), Kehitysvammaliitto ry (The Finnish Association on Intellectual and Developmental Disabilities - FAIDD), Kuuloliitto ry (Hearing association), Kuurojen liitto ry (Deaf association), Vammaisfoorumi ry (Finnish Disability Forum) and Kehitysvammaisten tukiliitto ry (Association to support people with intellectual disabilities). A separate statement was asked from The Advisory Board for the Rights of Persons with Disabilities and Kynny ry (The Threshold Association). The legislative process also includes several deliberations in special committees which also included representatives from associations of different disabilities. These committees request written statements from different actors also disability associations.

⁸ Act on the Provision of Digital Services
<https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

⁹ Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016L2102&from=EN>.

¹⁰ Government Programme <https://valtioneuvosto.fi/en/marin/government-programme>.

¹¹ Act on the Provision of Digital Services
<https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

¹² The process of the Governments proposal HE 60 /2018
https://www.eduskunta.fi/FI/vaski/Kasittelytiedot/Valtiopaivaasia/Sivut/HE_60+2018.aspx.

The digitalisation programme is based on the principles of the digitalisation of public administration drafted in 2017.¹³ These principles regulate all digitalisation of public services. They include customer-centredness, the reduction of unnecessary visits to different service-related offices, and the creation of services that are safe and easy to use and add value for the customer. The principles do not specifically identify any groups. An advisory committee (Digi arkeen)¹⁴ was set up in 2017, consisting of NGOs, researchers and three ministries. It creates a direct discussion forum for the Government, researchers and service user representatives. Following associations of disabilities were included: Invalidiliitto ry (The Finnish Association of People with Physical Disabilities), SAMS – Samarbetsförbundet kring funktionshinder rf (Co-operation association around disabilities), Kynnys ry (The Threshold Association), Näkövammaisten liitto ry (Finnish Federation of the Visually Impaired) and Kehitysvammaliitto ry (The Finnish Association on Intellectual and Developmental Disabilities - FAIDD).

The Ministry of Finance established the Programme for the Promotion of Digitalisation¹⁵ on 25 February 2020. The Programme's action plan for 2021 was published in January 2021.¹⁶ The programme supports and encourages public authorities to make their services digitally available to citizens and businesses by 2023. Alongside the Programme for the Promotion of Digitalisation, the Government Programme's other means for achieving its digitalisation goals are the National AI programme, AuroraAI;¹⁷ the Service and Premises Network Renewal and the Digital Identity Development Project. The AuroraAI network aims to make everyday life and business easier in a secure and ethically sustainable way. Artificial intelligence (AI) will create models that can drive the best public administration in the world. The Government has subsidised projects to implement these programmes. People with disabilities are not singled out but all the actions concerning accessibility, design for all and inclusion include all citizens.

The ongoing health and social services reform¹⁸ aims to improve public health care and social services. The responsibility for organising health and social services will be transferred from municipalities to counties. Health and social services will be developed as part of the Future Health and Social Services Centres programme. This programme improves the person-centred approach by, for example, introducing digital and mobile services. Digitalisation is an integral part of the implementation of all the objectives.¹⁹ This digital transformation of health and social services has been ongoing for all past steps of preparation.

The digitalisation for the social and health care reform is implemented with several national projects: Toivo, Virta and Valtava. Toivo programme²⁰ (implementation programme for knowledge-orientated leadership, steering, and supervision in social

¹³ Principles of Digitalisation <https://vm.fi/documents/10623/1464506/Digitalisoinnin+periaatteet/63c2a2fa-b7b5-45e4-8516-bd804490fecf/Digitalisoinnin+periaatteet.pdf>.

¹⁴ Digi arkeen <https://vm.fi/digi-arkeen-neuvottelukunta>.

¹⁵ Programme for the Promotion of Digitalisation <https://vm.fi/en/programme-for-the-promotion-of-digitalisation>.

¹⁶ Programme for the Promotion of Digitalisation <https://vm.fi/en/programme-for-the-promotion-of-digitalisation>.

¹⁷ National AI programme AuroraAI <https://vm.fi/en/national-artificial-intelligence-programme-auroraai>.

¹⁸ National Health and Social Services Reform <https://soteuudistus.fi/en/frontpage>.

¹⁹ Changes in legislation <https://soteuudistus.fi/lakiluonnos-14.10.2020>.

²⁰ Toivo Programme <https://soteuudistus.fi/en/toivo-programme>.

welfare and health care) seeks to plan and develop the capacity of knowledge management of the health and social services in the responsible counties. The aim of the Ministry of Health and Social Affairs is to establish overhaul the knowledge production and knowledge base of national authorities, and to create nationwide knowledge management solutions.

Virta Project²¹ develops the pre-conditions for the implementation of knowledge-orientated leadership in municipalities, joint municipal authorities, and health and social services. Virta Project is coordinated by DigiFinland.²² Virta project aims to enable the management of municipalities, joint municipal authorities, and health and social service counties through reliable and up-to-date knowledge based on uniform, nationally defined information models. The project develops expertise in knowledge-orientated leadership at the organisational level and aims to promote coherence in the content of knowledge-orientated leadership and national monitoring.

Valtava project²³ aims to reform the national knowledge production in the field of social welfare and health care in order to meet the knowledge management needs of the counties and the monitoring, evaluation, supervision, and oversight duties of Finnish authorities. As a result of the reform, the authorities and the health and social services counties to be established will have access to comprehensive, up-to-date, and high-quality knowledge from both the health care and social welfare sectors. The harmonisation of knowledge in these sectors will uniform the information and make it comparable at the national level. The Valtava project seeks to modernise existing knowledge production channels and establish new ones, such as those used to generate data on the staffing ratios and operational capacity of services for older people, as well as financial, operational, and personnel data. New production channels such as these enable more accurate evaluation and supervision of the service system.

A national IT infrastructure will be developed in Valtava project, and this will enable automated knowledge management and the utilisation of social welfare and health care knowledge through a single interface. The Valtava project is the result of cooperation between the Social Insurance Institution of Finland (Kela), the Finnish Institute for Health and Welfare (THL) and the National Supervisory Authority for Welfare and Health (Valvira).

2.2 Disability inclusion in focused or sector-specific strategies on digitalisation and digital transformation

There is no online voting in Finland. No national strategies address the implications of the transition to such technologies for persons with disabilities within their national priorities. The national strategies include all citizens without specifying any particular groups. The national strategies and recommendations must always adhere to legislation such as the Non-discrimination Act and the Act on the Provision of Digital Services 306/2019²⁴ so that everyone is included.

²¹ Virta project <https://digifinland.fi/toimintamme/virta-hanke/virta-hanke-lisatieto/>.

²² DigiFinland <https://digifinland.fi/>.

²³ Valtava project <https://soteuudistus.fi/en/toivo-programme>.

²⁴ Act on the Provision of Digital Services <https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

The Proposal for Accessible Higher Education²⁵ has been on commenting 2.4.–7.5.2021 in lausuntopalvelu.fi. In the proposal the objective 36 states ex. that the accessibility of digital services will be promoted systematically at the HEI's. The universities will ensure that as many disabled, disabled people as possible can access websites independently. Every HEI has a plan to implement the accessibility requirements of Act on the Provision of Digital Services 306/2019²⁶ in all digital systems and services. The staff and students of HEI's will be instructed, trained and guided to implement it. In the chapter 9.2.9. there are discussions on people with disabilities and limited ability to function in two objectives. Objective 49: The Ministry of Education and Culture will ensure that the drafting of legislation and the implementation of laws take due account of the obligations of the CRPD and contribute to the implementation of the national action programme of CRPD. Objective 50: The HEI's will promote equal participation of persons with disabilities in higher education by raising awareness of the rights of persons with disabilities. It is not known how the proposal will be changed after the comments from different stakeholders.

The DigiVisio 2030²⁷ project is one of the decade's most significant digitalization projects for higher education institutions in Finland. Its aim is to ensure flexible learning opportunities for learners as well as to improve the competitiveness of Finnish higher education institutions globally, while preserving their autonomy and opportunities for strong profiling. All Finnish higher education institutions are participating to the DigiVisio 2030 project and signed a participation agreement.

During the preparatory phase, all higher education institutions committed themselves to DigiVisio and project planning by signing a letter of intent. The DigiVisio 2030 participation agreement is an extension of the letter of intent, and the administrative model and implementation of the project are agreed upon in it. In addition, the participation agreement lays out common key principles that ensure implementation in a transparent and flexible manner so that it is possible to apply for and obtain funding for the project from different sources. The participation agreement also enables the participation of higher education institution experts in the implementation of the project.

The Ministry of Education and Culture has granted a special grant of EUR 20 million as the first funding for the project. In addition to the special grant, the Ministry of Education and Culture is allocating EUR 17.8 million in strategic funding to the project for 2021-2024. The documents available on the DigiVisio website do not specifically aim any targets or actions to people with disabilities. The variety of different learner profiles is illustrated with different terminology, not labels like disability, but as different needs people have.²⁸

²⁵ Kohti saavutettavampaa korkeakoulutusta tai korkeakoulua (2021) (Towards accessible higher education and HEI's)
<https://www.lausuntopalvelu.fi/FI/Proposal/DownloadProposalAttachment?attachmentId=15477>.

²⁶ Act on the Provision of Digital Services
<https://www.finlex.fi/fi/laki/ajantasa/2019/20190306?search%5Btype%5D=pika&search%5Bpika%5D=saavutettavuus>.

²⁷ DigiVisio 2030 <https://digivisio2030.fi/>.

²⁸ DigiVisio 2030 -hankkeen työpaja 14.8.2020: tiivistelmä tuotoksista (Results from the workshop)
<https://digivisio2030.fi/tiedostot/>.

3 Do disability strategies address the potential of and challenges pertaining to digitalisation and digital transformation?

3.1 How digitalisation and digital transformation are addressed in the national disability strategy

The second national action programme of the UN CRPD from 2020 and 2023²⁹ makes several references to digital services. In the public hearing of organisations of persons with disabilities to prepare for the action programme, their representatives were particularly concerned about the inaccessibility of current digital services experienced by persons with disabilities.

In the action programme, each action is designated to a ministry/ministries. Regarding digital services and transformation, one of the set goals is to promote the accessibility of websites to as many persons with disabilities as possible. In this goal, all ministries are mentioned as responsible duty-bearers. The planned actions are fourfold:

- Action number 32: To promote the accessibility of public websites and mobile phone applications through information dissemination, guidance, counselling and monitoring;
- Action number 33: To appoint an accessibility officer in each ministry;
- Action number 34: To include accessibility information in the e-learning packages of the ministries' orientation programmes;
- Action number 35: To ensure that all ministries' websites have an accessibility statement and offer the opportunity to give feedback.

These actions aim at systematic, structural and sustainable changes towards inclusion for all, which will be a great opportunity not only for persons with disabilities but also for many more who have diverse needs. The focal points could be opportunities for the Ministries to employ government officials with disabilities. A possible challenge might be tokenistic focal points of accessibility in Ministries, if enough expertise, technical skills and commitment to inclusion is absent among those appointed to these positions.

One goal is to develop an accessible, digitalised personal identification system. The Ministry of Finance is the designated duty-bearer of this goal. The planned action for this goal is as follows:

Action number 36: To explore new and accessible modalities of digital identification systems in collaboration with organisations of persons with disabilities.

When viewpoints of persons with disabilities and their expertise of accessibility is incorporated in the transformation of such systems for all the population, that would serve not only the needs of persons with disabilities alone but also beyond for many more people. This is a great opportunity for the whole society.

²⁹ Sosiaali- ja Terveysministeriö (Ministry of Social Affairs and Health). (2021) Oikeus osallisuuteen ja yhdenvertaisuuteen: YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallinen toimintaohjelma 2020-2023 (Right to participation and equality: CRPD national action programme 2020–2023). Publication series 2021:2 of the Ministry of Social Affairs and Health. https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162687/STM_2021_2_J.pdf?sequence=1&isAllowed=y.

One goal is to start developing digitalised employment services. The Ministry of Economic Affairs and Employment and the Ministry of Social Affairs and Health are the responsible duty-bearers. The planned action for this goal is as follows:

Action number 79: As part of broader development work on service needs assessment, to develop a digital tool for identifying services to increase work capacity. As part of this, the Road to Employment online service will be more closely integrated into the labour market ecosystem of employment services.

More concrete, positive examples are mentioned in the following part on employment.

3.2 How digitalisation and digital transformation are addressed in specific disability-related strategies

Example 1: SOTE reform

Finland has been undergoing a social and health service reform (SOTE reform), including the reform of the disability service law. The five key objectives of the future SOTE centres programme are:

1. to improve equal access to, timing and continuity of services;
2. to shift the focus of activities from heavy services to preventive and proactive work;
3. to improve service quality and effectiveness;
4. to ensure the multidisciplinary and interoperable nature of services;
5. to curb the growth of expenditure.

The Government of Finland states that digitalisation plays an important part in the implementation of all these objectives. It also states that the SOTE reform aims to improve the client-oriented approach by introducing digital and mobile services.³⁰

When it comes to the budget allocation, the annual budget allocated for ICT services in municipalities and associations of municipalities is currently EUR 620 million, prior to the SOTE reform. It has increased steadily over the last years. The estimate for costs related to ICT service changes in the coming years is estimated to be EUR 2-3 billion.³¹ This estimation of budget allocation implies great needs for development in this sector. Despite the huge implication of this for the lives of persons with disabilities in terms of their services, no specific mention is made to equal accessibility to digitalised modalities for clients with disabilities beyond equal access to all such as digital database and data management for customers.³²

³⁰ Government of Finland. (2021) Further development of services: health and social services to be developed as part of the future health and social service centres programme. Available at <https://soteuudistus.fi/en/further-development-of-services>.

³¹ Government of Finland. (2020) Digitalisaatio ja tiedonhallinta SOTE-uudistuksessa (Digitalisation and information management in SOTE reform). Available at <https://soteuudistus.fi/documents/16650278/40811180/Liite+2.+Digitalisaatio+ja+tiedonhallinta+sote-uudistuksessa.pdf/fc793e7c-0875-e16d-89de-17523d5c0155/Liite+2.+Digitalisaatio+ja+tiedonhallinta+sote-uudistuksessa.pdf?t=1602679916297>.

³² Government of Finland. (2020).

Example 2: Pilot personal budget projects

Two pilot personal budget projects have aimed to meet the individual support needs of persons with disabilities. These development projects are independent of the SOTE reform as mentioned above, including the legal reform of disability services. The SOTE reform and personal budget projects are, however, interlinked to some extent. The first pilot project was conducted in a small scale in 2018 and revealed that personal budgets require clients to have clear knowledge about their own needs and their capacity to take care of their required services by locating service providers. This was conceptualised by organisations of persons with disabilities as ‘unrealistic idealism’, which could ultimately be a way for municipalities to save money on the one hand. On the other hand, many customers involved in the pilot experienced freedom of choice and flexibility of services.³³ The survey conducted by THL³⁴ was filled by 75 pilot participants and revealed that the rhetoric of disability policy (Roulstone and Prideaux 2012)³⁵ was observed in the pilot project: including superficial promotion of equality and the right to self-determination based only on the individual capacity of persons with disabilities, with no monitoring, which may result in failing to meet their service needs. In this context, digitalisation is not discussed.³⁶

If careful and necessary support mechanisms are not established when digitalisation is hypothetically combined with the personal budget modality, the probability of undermining the indispensable service needs of persons with disabilities may increase, particularly among those with relatively low management capacity. Evaluation of the pilot study indicated that more time and resources were needed for service providers to meet the needs of their customers.³⁷ The second pilot project is ongoing (2020–2021)³⁸ with EUR 5 million budget³⁹ and aims to find a national personal budget action model, in which the self-determination right of persons with disabilities is genuinely secured. Digitalisation is not the focus of either pilot project, although it is assumed that digitalised service process, such as service application, communication with administrative decision makers, complaint making and so forth are natural part of the process (please see Annex 1).

³³ Myllyaho, Ruusa and Nurmi-Koikkalainen, Päivi. (2020) Henkilökohtainen budjetointi herättää toiveita ja pelkoja (Personal budget provokes expectations and fears). Available at <https://blogi.thl.fi/henkilokohtainen-budjetointi-herattaa-toiveita-ja-pelkoja/>.

³⁴ Myllyaho, Ruusa and Nurmi-Koikkalainen, Päivi. (2020).

³⁵ Roulstone, Alan and Prideaux, Simon. (2012) Understanding Disability Policy. Bristol: Policy Press.

³⁶ Myllyaho, Ruusa and Nurmi-Koikkalainen, Päivi. (2020) Henkilökohtainen budjetointi herättää toiveita ja pelkoja (Personal budget provokes expectations and fears). Available at <https://blogi.thl.fi/henkilokohtainen-budjetointi-herattaa-toiveita-ja-pelkoja/>.

³⁷ Ministry of Social Affairs and Health (Sosiaali- ja Terveysministeriö). (2019) Henkilökohtaisen budjetin arviointi (Evaluation of the personal budget). Available at <https://stm.fi/documents/1271139/3214387/HB-arviointi+seurantakyselyiden+yhteenveto.pdf/04d751f1-edb5-4869-3d39-a7fa6a35701d/HB-arviointi+seurantakyselyiden+yhteenveto.pdf>.

³⁸ Finnish Institute for Health and HeWelfarehealth (THL). (2020) Vammaisten henkilöiden henkilökohtainen budjetoinnin kokeiluhanke (pilot project of personal budget of persons with disabilities). Available at <https://thl.fi/fi/tutkimus-ja-kehittaminen/tutkimukset-ja-hankkeet/vammaisten-henkiloiden-henkilokohtaisen-budjetoinnin-kokeiluhanke>.

³⁹ Ministry of Social Affairs and Health (Sosiaali- ja Terveysministeriö). (2020) Vammaisten henkilöiden henkilökohtaista budjetointia kokeillaan vuosina 2020-2021 (Personal budget of persons with disabilities are on trial in 2020-2021). Available at <https://stm.fi/-/vammaisten-henkiloiden-henkilokohtaista-budjetointia-kokeillaan-vuosina-2020-2021>.

Example 3: Employment

The Career Opportunities for People with Partial Work Ability project (OTE project)⁴⁰ was one of the key projects of the government of Juha Sipilä and was implemented between 2015 and 2018. The objective of the OTE project was to improve the labour market opportunities of people with impaired ability to work by helping them continue their work or find new employment more easily than before. The project also aimed to foster more positive, open attitudes towards greater diversity in working life. Increasing the employment rate is vital to secure welfare services. The OTE project was carried out as a collaborative effort of the Ministry of Social Affairs and Health and the Ministry of Economic Affairs and Employment. The Finnish Institute for Health and Welfare (THL – Finnish abbreviation) coordinated the implementation of the key project and the Finnish Institute of Occupational Health (Mattila-Wiro and Tiainen, 2019).⁴¹ A total of EUR 11.5 million was spent on this project and EUR 7.2 million on regional experiments (Foreigner.fi, 2019).⁴²

The background is that 1.9 million Finns of working age have some type of disability or chronic illness, and 600 000 of these feel that their disability or illness affects their work or work opportunities. This number is expected to increase due to the ageing population in Finland. It will be impossible to sustain welfare services without a sufficient number of employed people and their tax revenue. Therefore, the focus on this particular group of people with partial work ability was a natural response to fill the increasing employment gaps in Finnish society. The employment of this group of people is expected to reduce inequality and poverty thereby increasing equality in society. Therefore, the project shifted the focus away from people's limitations to their skills, strengths, and a culture of collaboration. In this way, the project tried to transform society's negative attitude towards this group into a more welcoming one. The project targeted three groups: employers, persons with partial work ability, and society. (ibid. 11).

The methods for implementing the change were:

- the training of work ability coordinators;
- the 'Tie työelämään' (Road to employment) online service;
- regional experiments;
- research and studies;
- collaboration between employers and workplaces;
- collaboration with central labour market organisations, health and social service organisations and disability NGOs;
- several working life seminars and events;
- active communication;

⁴⁰ Finnish Institute for Health and HeWelfarealth (THL). (2020) Osatyökykyisille tie työelämään (OTE) 2016-2018. Available at <https://thl.fi/fi/tutkimus-ja-kehittaminen/tutkimukset-ja-hankeet/osatyokykyisille-tie-tyoelamaan-ote->

⁴¹ Mattila-Wiro, Päivi and Tiainen, Raija. (2019) Kaikki mukaan työelämään: Osatyökykyisille tie työelämään (OTE) kärkihankkeen tulokset ja suositukset. *Ministry for Social Affairs and Health. Helsinki. Available at:* <https://valtioneuvosto.fi/documents/1271139/3022628/OTE+loppuraportti+LUONNOS+8.3.2019.pdf/c570acea-c1c5-1c1c-7a19-c893c0aabfb6/OTE+loppuraportti+LUONNOS+8.3.2019.pdf>.

⁴² Foreigner.fi. (2019) Finland reduced unemployment by 30% among people with limited work ability. <https://www.foreigner.fi/articulo/work-and-study/finland-advances-in-the-integration-of-disabled-workers/20190429165433001790.html> (Uploaded on 29.4.2019).

- widespread media visibility; and
- legislative measures.

Among these methods, the “Road to employment” online service is particularly relevant. This was in fact one of the most important achievements of the OTE project that is used by 11 000 persons per month (ibid. 13). A more detailed account on equal accessibility of this online service was unavailable in reports of the project. Due to the Accessibility Directive (2016/2012), the service has to be accessible also for persons with disabilities.

In December 2017, as part of the project, trade union confederations, health and social service organisations and disability organisations committed to collaborating to find ways to support employment of people with partial work ability (p. 44).⁴³ The partnership with organisations of persons with disabilities highlights the project’s focus on basic accessibility.

As part of the key project, the Ministry of Social Affairs and Health produced a report (2019)⁴⁴ on the social services reform, promoting access to employment and rehabilitative work activities for people with disabilities. The report highlights the importance of multisectoral cooperation, such as social services and employment services, to assess suitable services for each person with a disability. The report does not refer to the opportunities and challenges related to digitalisation. Digital technologies are often taken for granted as a natural development (please see Annex 1).

Several studies on the employment of persons with intellectual disabilities refers to many opportunities related to digitalisation, such as audio coaching⁴⁵ and a photo activity schedule book.⁴⁶ According to these studies, covert audio coaching provided to supported employees, who are persons with intellectual disabilities, increased their work performance and thus employability. Personalised feedback was given only to them via a hearing device from a distance. When it comes to the photo activity schedule book, it also increased work performance for persons with intellectual disabilities. Another study⁴⁷ found that digital solutions improved the work performance of people with intellectual disabilities in the open labour market. However, digital solutions are rarely used in practice due to a lack of employers’ capacity and the limited

⁴³ Finnish Government. (2019) Finland’s Initial Report on the Implementation on the Convention on the Rights of Persons with Disabilities. Finnish Government. Helsinki. <https://um.fi/documents/35732/0/CRPD+initial+report+Finland.pdf/959fa430-9e7e-9fe0-76d1-c435f47181ea?t=1565948791606>.

⁴⁴ Ministry of Social Affairs and Health. (2019) Selvitysraportti: Vammaisten työllistymistä tukevan toiminnan ja työtoiminnan uudistaminen (Report: Reform of the employment support and employment activities of persons with disabilities).

⁴⁵ Allen KD, Burke RV, Howard MR, Wallace DP, Bowen SL. (2012) Use of audio cuing to expand employment opportunities for adolescents with autism spectrum disorders and intellectual disabilities. *J Autism Dev Disord.* 42(11):2410–9. Available at <https://vcrrtc.org/research/documents/pdf/CovertAudioCoachingEffects.pdf>.

⁴⁶ Carson KD, Gast DL, Ayres KM. (2008) Effects of a photo activity schedule book on independent task changes by students with intellectual disabilities in community and school job sites. *Eur J Special Needs Educ.* 23(3):269–79. Available at <https://www.tandfonline.com/doi/abs/10.1080/08856250802130475>.

⁴⁷ Nevala, Nina et al. (2019) The effectiveness of rehabilitation interventions on the employment and functioning of people with intellectual disabilities: a systematic review. *Journal of Occupational Rehabilitation.* 29. P.773-802. Available at <https://link.springer.com/article/10.1007/s10926-019-09837-2>.

competence of persons with intellectual disabilities. Moreover, aforementioned studies targeted persons with relatively mild intellectual disabilities, thus their results are not generalizable. More rigorous, empirical research on persons with diverse disabilities is still needed.

The digitalisation-related opportunities in this process have been forcibly identified in the COVID-19 pandemic, as remote work options have finally been realised for the general population including persons with disabilities. According to the latest report on the employment of persons with disabilities commissioned by the Ministry of Labour,⁴⁸ employers were previously reluctant to allow employees this opportunity or simply did not have the capacity to offer it. According to the author of the report, Kyröläinen, states, “Everyone does not necessarily have equal opportunities to have IT devices or use digitalised services. In addition, instruction and peer support are instrumental to promote digital capacity (of persons with disabilities)” (p. 54).

It becomes clear from these reports and projects specifically for persons with disabilities that digitalisation has not attracted sufficient attention to significant current and future opportunities and those efforts to remove barriers are still largely lacking. This observation is consistent with the information presented in 3.1., that digitalisation has focused mainly on activities intended to fill some of the gaps mainly of the capacity of duty-bearers and not that of rights-holders, although the latter is equally important for the digital transformation to be inclusive.

⁴⁸ Kyröläinen, Anni. (2020) Vammaisten henkilöiden työllistymisen rakenteelliset esteet. (Structural barriers to employment of persons with disabilities) Työ- ja elinkeinoministeriön julkasuja 2020:36. Helsinki. Available at: https://tem.fi/-/report-barriers-to-employment-of-persons-with-disabilities-to-be-removed?fbclid=IwAR20QuPCj4zqDKedFMBUrDGIamj1tPqAOJ_b0pQhKsgVzB52EKFVXGQLOP_A.

4 Promoting disability inclusion through funding, education and training

4.1 How funding promotes disability-inclusive digitalisation and digital transformation

Digitalisation has been the cross-cutting key strategy of the most recent governments. Juha Sipilä's government launched a key digitalisation programme that ran from 2015 to 2019. In the framework of this programme, EUR 100 million were allocated to 15 significant digitalisation projects.⁴⁹ In 2019, the Act on Information Management in Public Administration (906/2019) was adopted that defines the entire lifecycle of information in Finnish public administration and thus is naturally relevant to the whole population including persons with disabilities.

The previous government, that of Antti Rinne, which the current government of Sanna Marin largely took over, set a goal to promote digitalisation in public services, to be completed by 2023. The Provision of Digital Service Act (306/2019) was enforced and refers to the EU Accessibility Directive (2016/2102) for equal accessibility.⁵⁰ The Digital Service Act specifically mentions the accessibility of persons with disabilities.

In 2019, the Government budgeted EUR 860,000 of special funding for public libraries' digitalisation projects. The money was used in 2020 to train and strengthen librarians in public libraries following the action model established by the AUTA project.⁵¹ ⁵² The model is established on three pillars: digital support modalities, digital support actors and guidance, finance and legal basis. Depending on the needs of the actors, for instance old persons with small income without IT devices and 250 000 Finns (5 % of the Finnish population) who have some kind of disabilities that hinder them from benefiting from digital services without suitable and adjusted IT devices. In this way, this model reflects the diverse needs of persons with disabilities.

As for public, academic funding, the European Research Council and the Academy of Finland are the two main funders. For instance, Professor Anne Kouvonen at the University of Helsinki leads a research project entitled 'Towards a socially inclusive digital society: transforming service culture' funded by the Academy of Finland from 2019 to 2021. However, disability inclusion is not the prevailing practice in all publicly funded research projects. In reality, disability has rarely been included as an integral part of mainstream research.

⁴⁹ Ministry of Finance (Valtiovarainministeriö). (not dated) Digi projects of Sipilä's government 2015–2019 (Sipilän hallituksen 2015-2019 digihankkeet). Available at <https://vm.fi/digitalisoidaan-julkiset-palvelut>.

⁵⁰ ISA. (2020) Digital Public Administration factsheet 2020. European Commission. Available at https://joinup.ec.europa.eu/sites/default/files/inline-files/Digital_Public_Administration_Factsheets_Finland_vFINAL.pdf.

⁵¹ Sosiaali- ja Terveysministeriö (Ministry of Social Affairs and Health). (2021) Oikeus osallisuuteen ja yhdenvertaisuuteen: YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallinen toimintaohjelma 2020–2023 (Right to participation and equality: CRPD national action programme 2020–2023). Publication series 2021:2 of the Ministry of Social Affairs and Health. https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162687/STM_2021_2_J.pdf?sequence=1&isAllowed=y.

⁵² Ministry of Finance (Valtiovarainministeriö). (2017) Digituen toimintamalliehdotus (Action model of digital support). Available at https://api.hankeikkuna.fi/asiakirjat/2c278a11-3503-448d-803b-14adb2c9c681/27b3f7a8-f6f2-4fc6-b078-485d58003b54/JULKAISU_20181218092000.PDF.

4.2 How disability inclusion is promoted through the education and training of digital professionals

The Opintopolku⁵³ website offers information on available public education. Digital professionals are educated mainly in universities and universities of applied sciences. Some study programmes include health technology and a person-centred design, but the available data does not reveal how disability and accessibility matters are addressed. A sample of the content of five ICT engineer courses did not indicate any content related to disabilities or accessibility. The curriculums do not systematically consist of studies on accessibility and disability: this is dependent on the teachers' or students' interests.

The Regional State Administrative Agency and eOppiva offer a joint online course⁵⁴ on accessibility and implementing the Act on the Provision of Digital Services. NGOs⁵⁵ and other private providers^{56 57} also provide training on accessibility. These courses are specialised courses with different types of diplomas and are subject to a fee.

4.3 How digital inclusion and accessibility is addressed in the education and training of accessibility and inclusion professionals

The content of the professionals' training is not collectively regulated (excluding that of nurses). Every school and university can decide on the content. Social workers at bachelor's and master's degree level can specialise in disability services (legislation, service provision, communication, inclusion) but the education provider also decides on this content. The education of nurses includes some information on disabilities, mainly from the medical perspective. Health and social service professionals have varied knowledge about disabilities and accessibility. In other professions, this knowledge is incidental and often dependent on personal interest. A search for the words 'accessibility' and 'digitalisation' in the Opintopolku website study programmes revealed a few such programmes: master's studies in technical communication⁵⁸, special education teachers, and sign language interpreters. Open universities offer courses on accessibility.

4.4 How digital inclusion is addressed via the training of people with disabilities

Based on the Constitution of Finland (1999/731)⁵⁹ and the Non-discrimination Act (1325/2014),⁶⁰ children and persons with disabilities have equal rights to all others. In this regard, in principle, they are also guaranteed equal opportunities to access training to gain and improve knowledge and understanding of digitalisation and digital

⁵³ Opintopolku https://opintopolku.fi/app/#!/haku/*?page=1&itemsPerPage=25&sortCriteria=0&facetFilters=teachingLangCode_ffm:FI&facetFilters=topic_ffm:teemat_11.aiheet_84&facetFilters=educationType_ffm:et_01.04.01&tab=los.

⁵⁴ Saavutettavuus ja digipalvelulain vaatimukset (Accessibility and the requirements of the Act on Provision of Digital Services. <https://www.eoppiva.fi/koulutukset/saavutettavuus-ja-digipalvelulain-vaatimukset/>).

⁵⁵ Papunet <https://papunet.net/saavutettavuus/koulutukset>.

⁵⁶ Koulutus.fi <https://www.koulutus.fi/artikkelit/saavutettavuusdirektiivi-mika-se-on-17996>.

⁵⁷ Tieturi <https://www.tieturi.fi/koulutukset/ohjelmistokehitys/saavutettavuus>.

⁵⁸ Vaasan yliopisto <https://opintopolku.fi/app/#!/korkeakoulu/1.2.246.562.17.63610178483>.

⁵⁹ Available at <https://www.finlex.fi/fi/laki/ajantasa/1999/19990731>.

⁶⁰ Available at <https://www.finlex.fi/fi/laki/alkup/2014/20141325>.

transformation. In practice, however, equal opportunities are not realised for many reasons. First, municipalities have decentralised decision-making power in the Finnish administrative system and sometimes interpret laws and policies differently in their implementation. For instance, in education institutions, digitalisation training is not equally accessible to all due to a lack of coordination.⁶¹ Lack of equal access in different municipalities is a well-recognised challenge in Finland, which the aforementioned SOTE reform is trying to improve.

Second, the education level of persons with disabilities has been constantly lower than that of the rest of the population.⁶² For instance, according to the initial report of the Government of Finland (2019),⁶³ the number of students with the most severe⁶⁴ disabilities transferring from basic education to secondary education was approximately 350. On average, students with the most severe disabilities account for 1.9 % of all students. According to a broader definition, around 1 160 students with disabilities transfer from basic education to secondary education each year. This amount to only 6.3 % of all students who are pupils with disabilities. Some of the reasons behind this general lack of education are the ignorance of persons with disabilities on the one hand, and ignorance of the police on the other hand who do not file inaccessibility-to-education-cases as human rights violations,⁶⁵ a lack of resources, physical and attitudinal barriers, and a lack of disability inclusion focal points.⁶⁶ The biggest newspaper in Finland, Helsingin sanomat, reported lack of resource as a pertinent problem in today's inclusive education practices.⁶⁷ After the modification of law on education that entered into force in 2011, inclusive education has been promoted over special education. In 2019 every 5th pupil, 113 000 pupils in number, received some kind of educational support for their needs. About 8 % of all pupils have some kinds of disabilities. However, the aforementioned newspaper article introduces an argument of teacher's union's (Opettajien ammattijärjestö) that some municipalities

⁶¹ Finnish National Agency for Education. (not dated) Digitalisaatio oppimisen uudistamisen, tasa-arvon ja saavutettavuuden mahdollistajana (Reform of digitalisation learning as an enabler of equality and accessibility). Available at <https://www.oph.fi/fi/tietoa-meista/digitalisaatio-oppimisen-uudistamisen-tasa-arvon-ja-saavutettavuuden-mahdollistajana>.

⁶² E.g. see the SILC statistics in Katsui, Hisayo and Valkama, Katja. (2021) European Semester 2020-2021 country fiche on disability equality: Finland. Available at <https://ec.europa.eu/social/BlobServlet?docId=23945&langId=en>.

⁶³ Finnish Government. (2019) Finland's Initial Report on the Implementation on the Convention on the Rights of Persons with Disabilities.

⁶⁴ Severe disability (vaikeavammaisuus) is a term used in Finnish legislation. The subjective rights laid down in the Disability Services Act 380/1987 are accorded to persons with severe disabilities specified in the Act. The meaning of severe disability is defined separately for each service, and the right to receive the service is decided based on individual need. Some of the services are, however, defined by quite precise quantitative criteria. Based on the Act on Special Care for Persons with Intellectual Disabilities 519/1977, special-care services are granted to persons with intellectual disabilities without categorising them according to the degree of severity of their disability <https://thl.fi/fi/web/vammaispalvelujen-kasikirja/oikeuskaytanto/henkilokohtainen-apu/vaikeavammaisuuden-maarittely>.

⁶⁵ Kumpuvuori, Jukka. (not dated) Legally scrutinising the position of persons with disabilities in higher education (Oikeudellinen katsaus vammaisten opiskelijoiden asemaan korkeakouluissa). Available at <http://www.esok.fi/esok-hanke/artikkelit/kumpuv>.

⁶⁶ Heini, Annina and Klemetti, Jari. (2018) Study on employment needs and challenges of students with disabilities in higher education (Selvitys vammaisten korkeakouluopiskelijoiden työelämätarpeista ja –haasteista). Available at https://www.eesteetoihin.fi/wp-content/uploads/Kynnys-ry_Selvitys-vammaisten-kekorkeakouluopiskelijoiden-tyoelamatarpeista-ja-haasteista.pdf.

⁶⁷ Grönholm, Pauliina. (2021) Tukea tarvitseva samassa ryhmässä muiden kanssa (Those who need support are in the same group). Helsingin sanomat. 23.5.2021. Page A6.

have been using inclusive education as a way to save money by placing pupils with disabilities in local schools without sufficient support and resources. Therefore, persons with disabilities have been left behind from existing educational opportunities, particularly digital transformation opportunities.⁶⁸

Hence, training intended for only persons with disabilities is arranged mainly by organisations of persons with disabilities for their members. For instance, the Finnish Association of People with Physical Disabilities (Invalidiliitto) was a member of the first national advisory board, 'Digitalisation of daily life (digi arkeen)' between 2017 and 2020.⁶⁹ In 2018, the Association implemented a project entitled 'Participation through peer advice on digitalisation (Osallisuutta digivertaisneuvonnan avulla)'. In the context of this project, the Association trained its member organisations of persons with physical disabilities and funded the promotion of peer support in digitalisation.⁷⁰ The public sector does not arrange specific training meant only for persons with disabilities, except for training in the framework of special basic and tertiary education, while general education is not yet quite inclusive as mentioned above, which is the third reason why equal opportunities are not realised in digitalisation training.

⁶⁸ Finnish Association of People with Physical Disabilities (Invalidiliitto). (2020) Digitalisation promotes participation of persons with disabilities (Digitalisaatio edistää vammaisten ihmisten osallisuutta). Available at <https://www.invalidiliitto.fi/ajankohtaista/digitalisaatio-edistaa-vammaisten-ihmisten-osallisuutta>.

⁶⁹ In 2020, the second advisory board members were appointed and started their three-year mandate. The members include representatives of the Finnish Disability Forum and Finnish Association on Intellectual and Developmental Disabilities.

⁷⁰ Finnish Association of People with Physical Disabilities (Invalidiliitto). (2020) Digitalisation promotes participation of persons with disabilities (Digitalisaatio edistää vammaisten ihmisten osallisuutta). Available at <https://www.invalidiliitto.fi/ajankohtaista/digitalisaatio-edistaa-vammaisten-ihmisten-osallisuutta>.

5 The opportunities and challenges presented by digitalisation and digital transformation to the rights of persons with disabilities

5.1 The most significant opportunities presented by digitalisation and digital transformation for persons with disabilities

The most significant opportunities are the possibilities to make rapidly digitalising public sector accessible with the expertise of persons with disabilities so that it will be accessible and inclusive for all beyond persons with disabilities. Persons with disabilities have accumulated vast knowledge how to solve different accessibility problems in their daily lives and organisational lives. Although digitalisation has taken place in the public sector and most of the Finnish people are used to using digitalised information and communication with the public sector already by now, more digital transformation is forthcoming in conjunction with the massive SOTE reform. This is a great opportunity to create systems and practices from the onset to be accessible and inclusive for all when collaboration with representative organizations of persons with disabilities is part and parcel of the reform not only regarding disability services but also the general services. That is, more systematic and systemic digital transformation can result in more systemic and systematic disability inclusion when sufficient attention is paid for.

As for opportunities related to persons with disabilities, there are a few significant opportunities. From the data collected in the VamO-project⁷¹ (Securing Inclusion and Preventing Marginalisation in Disability Social Work's Client Process), social work clients with disabilities have experienced that, digital services provide opportunities to multiply the information available and to use multiple channels. They provide opportunities to choose how and when to contact services. When one has good capacity to navigate website and complexity of disability and social services, this gives a great opportunity of freedom of choice. Another significant opportunity is employment. Digitalisation enlarges employability of many when they are provided with sufficient support as was discussed above.⁷² However, these do not apply to many persons with disabilities whose environment is disabling and whose capacity is not enough to be able to manage such disabling environment.

5.2 The most significant challenges faced by persons with disabilities in relation to digitalisation and digital transformation

One of the most significant challenges is the digital divide that reinforces already existing and deeply rooted inequalities in society between persons with and without disabilities, and further those among persons with disabilities. In the process of digitalisation and digital transformation, the digital support needs are identified for many groups of people including 250,000 persons with disabilities in Finland.⁷³ In

⁷¹ VamO https://www.julkari.fi/bitstream/handle/10024/139148/URN_ISBN_978-952-343-293-2.pdf?sequence=1&isAllowed=y.

⁷² Kyröläinen, Anni. (2020) Structural barriers against employment of persons with disabilities (Vammaisten henkilöiden työllistymisen rakenteelliset esteet). Ministry of Economic Affairs and Employment of Finland. The Ministry publication series 2020:36. Available at https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/162325/TEM_2020_36.pdf?sequence=1&isAllowed=y.

⁷³ Ministry of Finance. (2017) Digituen toimintamalliehdotus (Action model of digital support). Ministry of Finance. Helsinki. Available at https://api.hankeikkuna.fi/asiakirjat/2c278a11-3503-448d-803b-14adb2c9c681/27b3f7a8-f6f2-4fc6-b078-485d58003b54/JULKAISU_20181218092000.PDF.

addition to disabilities, many of them also face poverty⁷⁴, which impact on possibility to purchase IT devices such as smart phones, computers, and fast internet connection. When those are missing, it is hard to navigate highly digitalised information and communication jungle. For instance, the VamO-project⁷⁵ (Securing Inclusion and Preventing Marginalisation in Disability Social Work's Client Process) collected data on the experiences of persons with a disability regarding digital services. Client information systems were criticised for being difficult to log into, not allowing communication with specific social workers, and having e-forms that were difficult to use.

Many other intersections such as gender, age, language and ethnic background need to be also carefully scrutinised in relation to digitalisation and digital transformation experienced by persons with disabilities. For instance, the Finnish Association of People with Physical Disabilities (Invalidiliitto) argues that persons with disabilities, particularly older persons with disabilities, have been left behind in the development of digitalisation. This deepens their loneliness.⁷⁶ In this way, multiple layers of inequalities are most likely to be manifested in the form of digital divide experienced by many persons with disabilities.

⁷⁴ Björkberg, Elli et al. (2019) Mite vammaisten ihmisten oikeudet toteutuvat Suomessa? (How human rights of persons with disabilities are realised in Finland?) Finnish Disability Forum. Helsinki. Available at <https://vammaisfoorumi.fi/wp-content/uploads/2019/09/RAPORTTI-Työelämä-ja-köyhyys.pdf>.

⁷⁵ VamO https://www.julkari.fi/bitstream/handle/10024/139148/URN_ISBN_978-952-343-293-2.pdf?sequence=1&isAllowed=y.

⁷⁶ Finnish Association of People with Physical Disabilities (Invalidiliitto). (2020) Digitalisation promotes participation of persons with disabilities (Digitalisaatio edistää vammaisten ihmisten osallisuutta). Available at <https://www.invalidiliitto.fi/ajankohtaista/digitalisaatio-edistaa-vammaisten-ihmisten-osallisuutta>.

6 Conclusions and recommendations

6.1 Conclusions

As has been discussed above, the Finnish Government has led digitalisation with political will and generous resource allocation over the last few governments, especially the Sipilä's, Rinne's and current Marin's governments have references to promotion of digitalisation in their government programmes. Disability inclusion is legally binding in both national and international laws ratified by the Government. Yet, disability inclusion in the process is sporadic and unsystematic, as a result of which persons with disabilities are largely excluded in this process as evidenced by AUTA project report that refers to the digital support needs of 250 000 persons with disabilities in Finland.⁷⁷ We conclude that changes related to digitalisation have enlarged the existing disparity and inequality between persons with and without disabilities as the access to digitalised services for persons without a disability has dramatically increased (see Annex 1), and further among persons with disabilities. However, digitalisation is also regraded as an opportunity for many persons with disabilities especially in terms of freedom of choice and employment opportunity.

Digitalisation is implicitly used as a modality for budget cuts in the public sector as the fifth objective of the SOTE reform explicitly addresses ("To curb the growth of expenditure"), which complicates the situation. In this process, individual service users are increasingly responsible for claiming their services and rights on a digitalised platform, to which they have less equal access. Finland has been undergoing the SOTE reform, which includes disability services. Many Finnish persons with disabilities are afraid of losing their acquired service entitlement in the near future in conjunction with the reform, services for which they have sometimes had to fight. In this sense, if insufficient attention is paid to securing their rights, digitalisation and digital transformation can become another challenge to many persons with disabilities. Close monitoring of the development of this digital transformation is needed not to deteriorate already deeply rooted inequalities in our society.

6.2 Recommendations

- The Government needs a more systematic, deliberate strategy to specifically bring disability inclusion to the fore of the digitalisation and digital transformation process and avoid further increasing the existing disparity and inequality between persons with and without disabilities. Stronger political will and leadership to support disability inclusion is essential.
- Organisations of persons with disabilities and their expertise must be taken advantage of in the digitalisation process. Based on the UN Convention on the Rights of Persons with Disabilities, this recommendation is targeted at all stakeholders that make decisions on digitalisation, from the national to the local level. When their needs are incorporated in planning of digital transformation from the onset, the final product of service is much more likely to be accessible for persons with disabilities.
- Any public funding for digitalisation and digital transformation needs to stipulate inequality reduction of the Sustainability Development Goal 10 as an integral part

⁷⁷ Ministry of Finance. (2017) Digituen toimintamalliehdotus (Action model of digital support). Ministry of Finance. Helsinki. Available at https://api.hankeikkuna.fi/asiakirjat/2c278a11-3503-448d-803b-14adb2c9c681/27b3f7a8-f6f2-4fc6-b078-485d58003b54/JULKAISU_20181218092000.PDF.

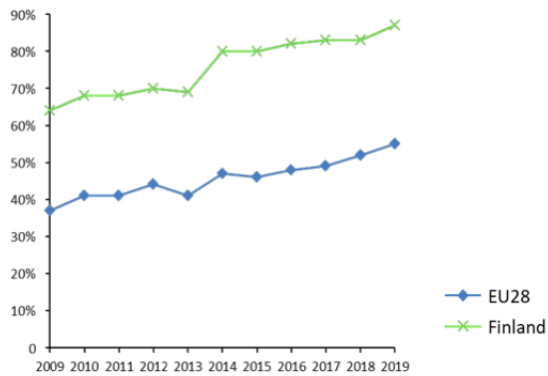
of the call. Reference to disability needs to be explicitly made as to the reduction of barriers to digital access and enabling transformation.

- The teaching curriculum of professionals who deal with the services for persons with disabilities systematically needs to include a compulsory disability-specific training module in which equal digital access for all including persons with disabilities should be taught.

Annex 1

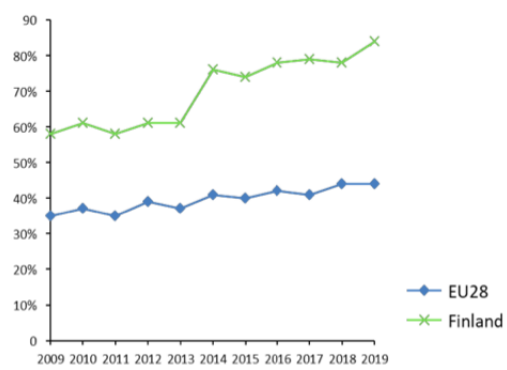
Percentages of individuals using the internet for interacting with public authorities in Finland in comparison with EU average⁷⁸

Percentage of individuals using the internet for interacting with public authorities in Finland



Source: Eurostat Information Society Indicators

Percentage of individuals using the internet for obtaining information from public authorities in Finland



Source: Eurostat Information Society Indicators

⁷⁸ ISA. (2020) Digital Public Administration factsheet 2020. European Commission. Available at [https://joinup.ec.europa.eu/sites/default/files/inline-files/Digital Public Administration Factsheets Finland vFINAL.pdf](https://joinup.ec.europa.eu/sites/default/files/inline-files/Digital%20Public%20Administration%20Factsheets%20Finland%20vFINAL.pdf).

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