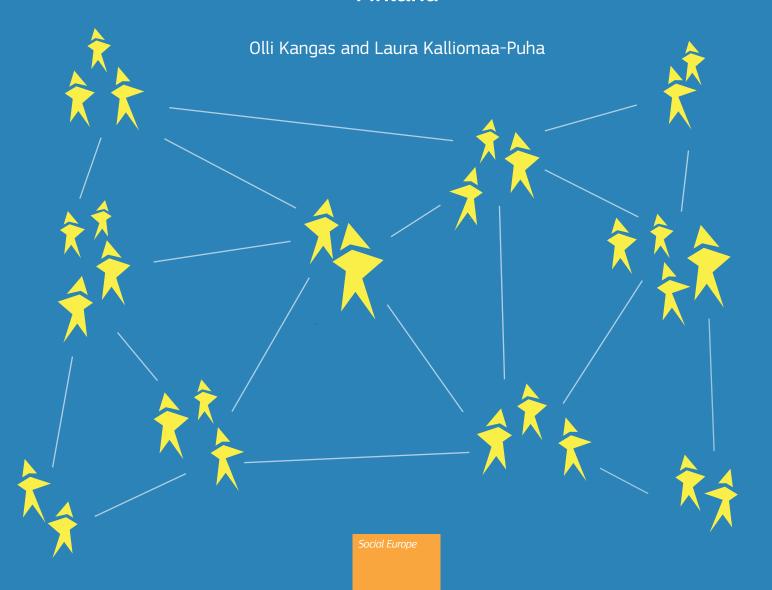


EUROPEAN SOCIAL POLICY NETWORK (ESPN)

Making access to social protection for workers and the self-employed more transparent through information and simplification

Finland



EUROPEAN COMMISSION

Directorate-General for Employment, Social Affairs and Inclusion Directorate D — Social Rights and Inclusion Unit D.2 — Social Protection

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European Social Policy Network (ESPN)

ESPN Thematic Report on Making access to social protection for workers and the self-employed more transparent through information and simplification

Finland

2022

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The European Social Policy Network (ESPN) was established in July 2014 on the initiative of the European Commission to provide high-quality and timely independent information, advice, analysis and expertise on social policy issues in the European Union and neighbouring countries.

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Manuscript completed in September 2022

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QUOTING THIS REPORT

Kangas, Olli and Kalliomaa-Puha, Laura (2022). ESPN Thematic Report on Making access to social protection for workers and the self-employed more transparent through information and simplification – Finland, European Social Policy Network (ESPN), Brussels: European Commission.

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Summary

The purpose of this report is to identify and analyse policies put in place by the country to improve transparency in access to social protection, considering both access to information and simplification of access. The report focuses on the six social protection branches covered in the 2019 Council Recommendation on Access to social protection for workers and the self-employed (hereafter "2019 Council Recommendation") and covers policies and measures implemented between January 2017 and May 2022.

The Finnish legislation on access to social security benefits and access to information stipulates that the actions of public authorities must be transparent, and that sufficient information on the rights and duties of clients must be provided. Furthermore, it is the duty of the benefits/service-providers to ensure that the clients understand what their social rights are and what they are committing to. The issue is to what extent these aims specified in the legislation are met in practice.

All institutions responsible for social security provide information on their benefits, who is eligible, the conditions of eligibility and the levels of the benefits. Information is available on the internet, in various forms of social media, in paper form, in service numbers via telephone, and face-to-face contacts at the office of the insurance institution or their joint services points. Online benefit calculators are also available for self-calculation to see whether claimants might be eligible for benefits and what the benefits level would be. Most institutions provide information in Finnish, Swedish and English. The Social Insurance Institution (Kela) has a wider repertoire of languages including Sami, Arabic, Russian, and Somali. Furthermore, since 2019 information has also been available using clear language practices (selkosuomi) – where efforts are made to simplify the legal terminology, and Kela is expanding its online services in sign language.

Applications for benefits can be delivered either in person at offices of the institutions responsible for benefits, via post, telephone, or online. By now, most benefit applications are done online. Claimants can check the status of their applications online. The overarching idea is that digitalisation can facilitate people's participation in society. For example, for people with disabilities, screen readers and interpretation programs help claimants in the application processes and to get information about their social rights. For those who lack internet access, the internet is available for free in public libraries and on most public service sites. However, not all clients have the proper digital literacy skills needed. Therefore, special attention has to be paid to clients without the necessary skills or with some restrictions, such as older people and people with disabilities.

The Finnish national digital service strategy (2022) is aimed at universalism: nobody should be left behind. The aim of the national "Aurora" programme is to utilise artificial intelligence (AI) to help people get the information they need. The Aurora programme will also help to provide people with individual evaluations of their service needs and improve their access to, and information on, social benefits. The personal social security number allows social insurance institutions to combine, for example, data from the income register with other relevant registers such as the National Archive of Health Information (Kanta) containing health and medical information. There are thus possibilities for reducing bureaucracy and the number of documents and declarations needed in the application process.

As a rule, awareness campaigns are launched in the context of significant reforms or events, such as the introduction of the guarantee pension in 2011, the 2017 pension reform, the 2022 family leave reform or the COVID-19 pandemic. There are studies indicating that extra information provided improves the take-up rates of benefits and general acceptance of the reform, but they do not necessarily increase the level of objective knowledge of the specific content of the reform.

1 Current policies and practices to ensure the information on, and to simplify access to, social protection for workers and the self-employed

In order to understand current policies and practices to ensure information and simplify access to social protection, one must first know the structure of the Finnish social protection system. The Finnish income transfer system comprises three parts. The first part quarantees minimum income security, including access to benefits, for residents in Finland rather than citizens. Citizenship is not a condition for getting benefits. The first part also includes basic-level social benefits paid either at a flat rate or after means-testing based on personal or household income. In principle, these benefits are non-contributory. The Social Insurance Institution of Finland (Kela) is responsible for paying out these benefits in the case of: unemployment (basic unemployment allowance - BUA, and labour market subsidy - LMS); sickness, maternity and paternity; invalidity; and old age (national pension and guarantee pension). The second part comprises contributory income-related benefits. Whereas Kela is responsible for paying out income-related sickness, maternity and paternity benefits, voluntary unemployment funds administer income-related unemployment allowances, and semi-private insurance companies administer earningsrelated pensions, invalidity benefits and work accident and occupation disease insurance schemes. The third part consists of municipal healthcare services. Kela partly compensates patients for their utilisation of private healthcare services and reimburses their medicine costs. Kela also subsidises occupational healthcare provided by employers for their employees. The occupational healthcare system is mandatory (Kela, 2022a). The basic structure and responsibilities in the Finnish social security system are depicted in Figure 1.

O O Based on residence O O Based on employment (The Social Insurance nstitution o Finland) Municipalities Unemployment funds Social assistance Unemployment benefits services pension pensions Benefits Sickness Informal and disability Healthcare at work and nefits reha allowance occupation bilitation Parental and family benefits Housing Student financial aid Kela®

Figure 1. The structure of the Finnish social security system (Kela, 2019).

The Finnish social security system is comprehensive, and the broad picture shown in Figure 1 is clear. However, because there are many different institutions and actors responsible

for the delivery of benefits, it is not always clear and transparent to the client which institution is responsible for what. Each benefit-provider makes information available for the benefits it is responsible for. In addition, they also jointly share information on all the benefits, as does the Ministry of Social Affairs and Health (for example: MSAH, 2022).

General online information portals

Suomi.fi (2022) is a general online source of all kinds of information for all people. Suomi.fi is a service channel where all Finnish public administration services and transaction channels can be found. The service is for residents, businesses and authorities. Pages are available in 12 languages: Finnish, Swedish, English, Estonian, Russian, French, Somali, Spanish, Turkish, Chinese, Persian and Arabic. In addition, services are also available in sign language. Suomi.fi provides the ability to exchange messages with public authorities, and to access various registers and information on services and maps to see where services are available in person. In Suomi.fi, the information, instructions and services are brought together at one address. After logging in to Suomi.fi, people can communicate with different organisations, and check the data registered on them. The objective is equality, ensuring that everyone without discrimination can use services and understand the text describing the services. The Regional State Administrative Agency for Southern Finland supervises the implementation of the accessibility requirements in the whole country. The directive of the European Parliament and of the Council specifies the level of accessibility to public administration digital services. The Suomi.fi portal has been available from 4 April 2002. Data on the number of users or the number of accesses to the portal are not available.

InfoFinland is a multi-language website providing information to people planning to move to Finland and to immigrants already living in the country (InfoFinland, 2022). It is operated in co-operation with public authorities. The portal contains general information on the country and more specific information on working and residence permits, jobs, social security, housing and education possibilities and contact information. The website is available in Finnish, Swedish, English, Estonian, Russian, French, Somali, Spanish, Turkish, Chinese, Persian and Arabic. The portal was established in 2010. There are no exact data on the number of users of the portal.

1.1 Policies and practices to ensure access to information on social protection rights, entitlements and obligations

The Act on the Openness of Government Activities (1999/621) stipulates that the public authorities must publish their activities and services, and inform people of their rights and obligations. In addition, it is the duty of the authorities to make sure that clients understand what their social rights are and what they are committing to. This is stipulated, for example, in the Act on the Public Administration (2003/434) or the Act on the Status and Rights of Social Welfare Clients (2000/812).

One aspect of information on rights, entitlements and obligations is making social security clients aware of their options for making complaints, and appealing against decisions they are not satisfied with. As regards appeals against social security decisions, different routes depend on the benefits in question. Complaints relating to benefits paid by Kela go first to the Kela office with the ability to "self-correct". The next stage in the appeal process is the Social Security Appeal Board. The final legislative body handling the appeal is the insurance court. The same process is applied to unemployment benefits. In the case of earnings-related pensions, the first step involves the pension insurance company, the first appeal goes to the Employee Pensions Appeal Board and any subsequent appeal will go to the insurance court. Finally, complaints regarding accident and occupational disease compensation are also first handled by the responsible insurance institution, then by the Accident Appeal Board and finally by the insurance court. In principle, these processes are

¹ Directive on the Accessibility of the websites and mobile applications of public sector bodies (2016/2102).

clear, but clients are often not aware of how to challenge decisions they are not satisfied with.

The next Sections (1.1.1-1.1.2.6) contain descriptions of how general and personalised information on specific income-transfer and service schemes are provided to people, which kind of awareness-raising campaigns there have been, and if there have been some impacts upon the level of knowledge in relation to the benefit in question.

1.1.1 Policies and practices to ensure access to general and personalised information

As a rule, all institutions responsible for social security provide information on their benefits, who is eligible, what the conditions are and the levels of the benefits. Information is available on the internet, in paper form, in service numbers via telephone, and face-to-face contacts at the office of the insurance institutions or their joint services points². In most cases, online benefit calculators are also available to see whether claimants might be eligible for various benefits and how much (in Euros) they could receive. For example, Kela provides information on all the benefits it pays out, and in all the relevant cases the online calculator is available for making self-calculations (Kela, 2022b). The same applies to the other benefit-providers. These Kela services have been constantly developed and improved since 2006 when Kela started to share information digitally. All services are also available via Suomi.fi (see Section 1). In 2021, the number of times the Kela websites were accessed was about 80 million, in a country with 5.5 million inhabitants.

As regards Kela³, its information in most cases is available in Finnish, Swedish, English, Arabic, Russian and Somali. Kela also has an interpretation service for people with disabilities. Information in Finnish is also shared via social media: Facebook, YouTube, Twitter, LinkedIn and Instagram. Since 2017 Kela has used chatbots to offer quick and convenient access to customer service around the clock. Most other social benefits providers also use chatbots. On the OmaKela (MyOwnKela) e-service (started in 2021), clients can handle all their Kela matters – for example, apply for benefits, send attachments, review decisions, check payment dates and the amounts of benefits, notify changes, send and read messages, and check the status of their applications. Kela uses extensively the information accumulated in the national income register (effective in 2019) as a basis for benefits decisions. This makes it easier to apply for benefits. Fewer documents need to be sent to Kela. In 2021, OmaKela was accessed on about 35 million occasions (Kela, 2022g).

For those who lack internet access, the internet is available for free in public libraries and on most public service sites. In principle, social assistance should cover the costs of internet access for low-income clients. Since online banking electronic identification is also used for many digital services, access to digital public services is connected to access to financial services. However, having access to an electronic identification or the internet is not always enough: people in need of services sometimes have difficulties accessing the information provided on the internet. Therefore, special attention has to be paid to clients without the necessary skills, such as older people and people with disabilities (see, for example: Koskiaho & Saarinen, 2019; Perttola, 2019). They can get information on their benefits and initiate their benefit processes by telephone, via mail or by visits to their respective local offices. Kela also provides telephone support for digital application processes.

The Finnish national digital service strategy is aimed at universalism: nobody should be left behind. The Aurora programme is one tool in that process. The implementation of the programme is taking place from 2019 to 2023. The programme is designed to utilise AI to improve the functional and technical possibilities for co-operation between various sectors

 $^{^2}$ For multisectoral services, there is a common register for the Employment and Business Service Offices (TEOs), Kela, and the municipalities.

³ Kela is the most important social insurance institution providing social security benefits to the Finnish population in all their life phases.

of public administration and between the public and other sectors. Thus, Aurora is based on open, cross-sectoral networking so that services provided by different organisations function seamlessly, and people get proper information and can utilise the welfare services they need. For example, in the case of sickness, sick people will automatically be offered information on public, private and third sector services and income transfers. From the individual point of view, Aurora will reduce bureaucracy and the amount of time spent running from one place to another (Government of Finland, 2020; Ministry of Finance 2022).

1.1.1.1 Unemployment benefits

As regards Kela-based unemployment benefits, notably BUA and LMS, Kela provides comprehensive online information on these two benefits (Kela, 2022c). There is general information on the Finnish unemployment system (who is eligible for earnings-related benefits and who will get the Kela-based basic benefits). In addition, there is specific and more detailed information on BUA and LMS, who is eligible, how to apply, the amount of the benefit, the days of payments, and how to report days of unemployment and changes in the (un)employment situation. The online calculator helps people to estimate their eligibility and the level of the benefit (Kela, 2022b). There are information brochures and face-to-face personal information available at the Kela offices. Furthermore, the Kela telephone service helps all Kela customers. Since 2017 Kela has increased online information and improved its calculator services. Online services and information are available in Finnish, simplified Finnish (i.e. clear language practices, since 2019), Swedish and Sami. At present, Kela is expanding its online services in sign language.

Since 2017, Kela has increased its services in Sami, Russian, Arabic and Somali languages to better serve migrants and asylum-seekers.

Applications for benefits can be delivered either in person at Kela offices or via post, telephone and online. Most benefit applications are now done online. Claimants can check the status of their applications online.

As regards income-related benefits, trade unions and the other administrators of the funds provide similar information to that provided by Kela. They also offer the facility to calculate the benefit level online (see for example: YTK, 2022). In addition to individual unemployment funds, the Central Organisation of Unemployment Funds has its own information and calculation services (TYJ, 2022). Information and services are also available via the Suomi.fi portal (Section 1). Data on the number of users are not available.

Despite all the information shared, there are problems and negligence. In their study on the encounters between the young unemployed and the social security system, Helne and Hirvilammi (2021) concluded that the system is too bureaucratic and the unemployed do not always know which kind of benefits they are entitled to and what their rights and obligations are (see Section 2.1.1 below).

1.1.1.2 Sickness and healthcare benefits

The Finnish sickness insurance system is universal, in that not only are all employees and the self-employed included, but also those who do not have any income at all (home-makers, students, etc.). Whereas those without, or with very low, income are entitled to minimum flat-rate benefits, income-related benefits are paid to those whose incomes exceed the minimum threshold level (European Commission, 2018; see Kangas & Kalliomaa-Puha, 2018).

The Finnish healthcare system has three parts: the National Health Insurance (NHI), the municipality-based universal healthcare service, and mandatory occupational healthcare. The co-existence of these three models has resulted in a multichannel system in financing, in access to healthcare and consequently in different levels of availability and access to care and information. Ministries, municipalities and Kela provide information on all care options and co-operation between them (Suomi.fi, 2022). Furthermore, employers are

responsible for information on occupational healthcare (subsidised by Kela) for their employees.

Kela also reimburses costs for medicines prescribed for the treatment of an illness. Reimbursement is received directly at the pharmacy. The system became effective on 2 February 1970. The pharmacy digitally contacts Kela to check the claimant's eligibility. Kela and pharmacy shops provide information on the benefit (Kela, 2022d). In 2021, there were 3.8 million recipients of the direct-reimbursement benefits (Kelasto, 2022).

The Kanta digital service portal contains data and information on social welfare and healthcare and benefit utilisation (Kanta, 2022). All social welfare and healthcare service-providers are members of Kanta. All information is available from the same source, allowing service-providers to offer their clients better and more accurate services. Needless to say, there may be ethical problems in the utilisation of such a huge amount of personal data. Official utilisation is therefore strictly limited and regulated by legislation.

At Kanta, people can check their own details (e.g. the utilisation of healthcare, diagnoses, prescribed medicines, and vaccinations). For the individual, Kanta aims to make social care and healthcare provision more transparent and comprehensive. The Kanta portal was launched in 2010, and the monthly number of users is about 2.5 million (Kanta, 2020).

Kanta services have been developed in stages since 2010. Since 2017, all prescriptions have been issued electronically through the Kanta service. Kanta services will expand and become more responsive to clients' needs and the development of legislation. The services are developed in co-operation with the main users. There is a wide variety of customer forums and there are different levels of customer co-operation. The most important is the institutional co-operation between healthcare and social care providers and NGOs representing patients' organisations. Individual users representing the widest possible customer base are also involved in online development, to test and comment on the user-friendliness of the platform (Vuorikallas, 2022). In sum, the Kanta system benefits the service-providers as well as individual people (Kanta, 2022).

1.1.1.3 Maternity and equivalent paternity benefits

Maternity and paternity benefits are administered by Kela (on access to information, please consider the same as in Section 1.1.1.1). There is a special online service (KelaKerttu) on family benefits. On the KelaKerttu portal, Kela can share information and parents can ask about their benefits, and discuss and share their own experiences with other parents. KelaKerttu is also on Facebook. Signed-in customers will receive up-to-date information on family benefits for their news feed (KelaKerttu, 2022). KelaKerttu was launched in 2010, and by now there are about 10,000 monthly visitors to the portal.

Information on maternity and paternity benefits is also provided by parental clinics (all pregnant mothers regularly meet medical doctors and midwives to get all kinds of information), and antenatal classes give comprehensive information on various stages of childbirth. Topics include also information on various benefits available for parents (see for example: PerheArte, 2022).

1.1.1.4 Invalidity benefits

Invalidity benefits can be received through two different channels. First, Kela pays invalidity benefits, old-age pensions and other related benefits to those people who have no work history. Kela is responsible for national and guarantee pensions. Hence, Kela takes care of informing Finnish residents about access to these pension benefits and their application processes (see Section 1.1.1.1; see also Kela, 2022e).

Second, earnings-related invalidity benefits are available to an insured person who has a work history (and accrued pension rights) and who is older than 17, but has not yet reached the pensionable age. The earnings-related pension system is run by semi-private pension insurance companies. Individual companies and the Finnish Centre for Pensions (ETK)

provide comprehensive information on the pension system in general and individual rights in particular (see ETK, 2022a). It is possible online for individuals to check their pension rights and accumulation of pensions, and simulate the effects of postponement or early retirement on pension amounts. Data for the total working life, including those dating back more than six years, are available at any time on the online pension records. Pension-providers send out the printed pension record every third year to people living in Finland if they have not selected to primarily check their pensions online (ETK, 2022a). In addition, occupational healthcare providers are responsible for telling their customers about invalidity-related benefits.

1.1.1.5 Old-age benefits and survivors' benefits

For the general information provided, see Section 1.1.1; and for special information on pensions, see Section 1.1.1.4. After the retirement age, all disability pensions (Kela benefits as well as earnings/employment-related benefits) will be automatically changed into an old-age pension.

Kela provides general information on eligibility for the national pension and guarantee pension (when and how to apply, full amounts of the respective benefits, benefits calculator to evaluate the eligibility and the level of the pension). The same goes for survivors' pensions. Kela also analyses registers and sends reminder letters and messages to, or calls, those who, according to its analyses, are entitled to guarantee pension but who have not applied for it (see Section 1.1.2.5 for a closer description).

Information on earnings-related old-age pensions is provided by pension insurance companies, ETK and employers. People can use online calculators to check the level of their pensions and estimate how early retirement or postponement of retirement will affect the pension amount. General information is available on the ETK webpage⁴ (ETK, 2022). In 2021, there were 1.7 million visits to the webpage (Louhimies, 2022).

People can also get general information and have access to their personal data and registers via Suomi.fi.

1.1.1.6 Benefits in respect of accidents at work and occupational diseases

Work accident insurance is mandatory for employers. The employer must subscribe to an insurance policy that covers all the employees in the company. The work accident scheme is administered by private insurance companies. All employees are automatically insured. For self-employed work, accident insurance is optional. The self-employed can decide whether to subscribe to an insurance policy and what the income they want to insure is. If they do not have an insurance policy at all, they will be entitled to minimum level sickness benefits paid by Kela and all information related to those benefits (see Section 1.1.1.2). Private insurance companies and occupation healthcare providers share information on social security in the case of industrial accidents and occupational diseases (Financial Supervisory Authority, 2020).

The Organisation for Finnish Self-employed People (*Yrittäjät*) has its own online information portal on all social benefits (Yrittäjät, 2022). The information the portal contains is clear and useful. In principle, the webpage is known by all Yrittäjät members. However, there are no exact studies available of how well known the portal is among the self-employed.

1.1.2 General awareness-raising campaigns

The aim of the subsequent Sections (1.1.2.1-1.1.2.6) is to describe the awareness-raising campaigns on social security benefits. Furthermore, if sufficient data are available, the impacts of the campaigns listed below are discussed.

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⁴ Työeläke.fi

When it comes to Kela, its awareness-raising campaigns continuously communicate and market Kela benefits at Kela offices, online and on social media. When benefits change, a broader, multichannel campaign is often conducted about the change to reach the main target group of the benefit – for example, older people in the case of pensions (see Section 1.1.2.5) or parents in the case of family benefits (Section see 1.1.2.3) are targeted. Paid advertisements in mass media (newspapers, television and radio) are also used to support communications. During the COVID-19 pandemic, Kela launched the largest-ever awareness-raising campaign in print, online and on social media. Furthermore, printed information was distributed to every home. The target group was the total population (Latvala, 2022).

In addition, the ETK, unemployment funds and the Central Organisation of Unemployment Funds have continuous general awareness-raising campaigns on the benefits they are responsible for.

1.1.2.1 Unemployment benefits

Unemployment funds and trade unions try to nudge people to join unemployment funds and get coverage against income loss in the case of unemployment. In addition to trade unions' and unemployment funds' internet pages, one can also find advertisements in newspapers and radio. In order to increase fund membership rates among the young and immigrants, targeted awareness-campaigns are used. As regards the young, the internet, Facebook, Instagram and TikTok are important channels for distributing information. Special information packages are designed and delivered to teachers. As regards immigrants, information on unemployment benefits is delivered on the funds' webpages and via InfoFinland in different languages (Willman, 2022).

During the COVID-19 pandemic, the conditions for self-employed people to get access to Kela unemployment benefits were relaxed. Information on these changes was extensively distributed by the ministries, unemployment funds, Kela and Yrittäjät. The lion's share of information was provided on the homepages of the institutions, but social media (Twitter, Facebook, Instagram, LinkedIn) were also frequently used.

1.1.2.2 Sickness and healthcare benefits

The pandemic did not cause any major changes in sickness and healthcare benefits. However, the Finnish healthcare and social care system is currently due to be reformed. From the beginning of 2023 welfare counties (22 of them) will take the organisational responsibility for social care and healthcare from municipalities (see Section 1.2.3; Government of Finland, 2021). There are many general awareness-raising campaigns on the reform in general and its practical implications for individuals in particular. The target group of these campaigns is the total population.

1.1.2.3 Maternity and equivalent paternity benefits

Family leave reform will come into force on 1 August 2022. Kela is carrying out extensive awareness-raising campaigns targeted at families with children (for the channels Kela is using, see Section 1.1.1.3). In addition to the information channels discussed in Section 1.1.1.3, special information packages (brochures, webinars, animations, etc.) are targeted at employers, teachers and journalists. Printed material on the reform is available at the child clinics (*neuvola*). These materials are in Finnish, Swedish, Sami, English, Estonian, Russian, Somali and Arabic (Latvala, 2022).

1.1.2.4 Invalidity benefits

Concerning invalidity benefits, no major changes have taken place; nor could we identify any major policy changes during the pandemic. There are therefore no major awarenessraising campaigns.

1.1.2.5 Old-age benefits and survivors' benefits

Since the introduction of the guarantee pension in 2011, Kela has actively advertised the benefit and, on the basis of registers, monitored people who have the right to a guarantee pension but who have not applied for it. Kela contacts those people (by mail or by telephone) and explains to them their rights to get the benefit.

Pension insurance institutions provide individualised information (either on the net or by mail) on people's pension rights. There also are calculators available for individuals to evaluate for themselves the outcomes of different choices between employment and retirement (ETK, 2022b).

Earnings-related pensions were reformed in 2017 as well. Pension insurance institutions and the ETK have launched awareness-raising campaigns on the impacts of the reform (e.g. on how much pension will accrue if people postpone retirement, or how much pension will be cut in the case of early retirement and how changes in life expectancy affect retirement ages). The campaigns took place on the internet, on social media and by letters sent to all 700,000 people born in the years 1955-1964. They were the first ones the reform affected. In addition to the information letters, there were special websites with animations, radio and TV campaigns, cinema spots and printed advertisements. Trade fairs, and training events for some special target groups (e.g. journalists and teachers), were also organised (ETK, 2022b; Kuivalainen, 2022).

1.1.2.6 Benefits in respect of accidents at work and occupational diseases

Concerning benefits in respect of accidents at work and occupational diseases, we could not identify any major policy changes during the pandemic, nor relevant awareness-raising campaigns.

1.2 Policies and practices to simplify access to social protection

1.2.1 Simplification objectives embedded in reforms of social protection schemes

The aim of this section is to describe the main policies and practices whose stated objective was to simplify access to social protection schemes available for workers and/or the self-employed.

In 2022, the government finalised the largest ever social and health care reform (Sote) in Finland. The aim of the Sote reform, which will become effective in 2023, is to simplify access to social and health care services and to improve the interplay between the different service providers (see Section 1.2.3 and Kangas & Kalliomaa-Puha, 2022). In spring 2020, the government appointed a parliamentary committee to plan a comprehensive social security reform (Sotu) to make the whole social security system simpler. The term of the committee is 23. March 2020 to 31. March 2027. The grand aim of the Sotu reform is to make the whole social security system simpler. The committee addresses issues related to basic social security benefits, earnings-based benefits, social assistance and a better integration of services and benefits.

Since January 2017 no other major reforms have been carried out.

1.2.1.1 Unemployment benefits

There was no simplification objective embedded in reforms of unemployment benefits.

1.2.1.2 Sickness and healthcare benefits

There was no simplification objective embedded in reforms of sickness and healthcare benefits.

1.2.1.3 Maternity and equivalent paternity benefits

There was no simplification objective embedded in reforms of maternity or paternity benefits.

1.2.1.4 Invalidity benefits

There was no simplification objective embedded in reforms of invalidity benefits.

1.2.1.5 Old-age benefits and survivors' benefits

There were no reforms (including simplification objectives) in old-age and survivors' benefits. However, the Finnish government will reform the income basis for calculating pension insurance contributions for the self-employed. Currently, the self-employed themselves can decide which income they will insure. Oftentimes, they choose the lowest contribution category and thus underinsure themselves, which leads to low earnings-related pensions. The income chosen for pension contributions has ramifications for other income transfers as well. For example, sickness and family leave benefits are calculated on the basis of pension-giving income. The reform would be effective from 1 January 2023. (Kangas, 2022b).

1.2.1.6 Benefits in respect of accidents at work and occupational diseases

There was no simplification objective embedded in reforms of work accidents and occupational disease benefits.

1.2.2 Simplification of the application process for accessing benefits

In 2019, an income register was launched. The register contains updated information on the income of all Finnish residents. On the basis of the individual social security number⁵, social security institutions (e.g. Kela, insurance institutions and unemployment funds) combine register data (e.g. derived from Kanta; see Section 1.1.1.2) with the income register, and thus get a comprehensive picture of the claimant's situation. This process is designed to minimise bureaucracy and the number of documents that the claimant must provide when applying for benefits. This applies to all benefits.

As regards the Aurora programme, the goal is to use AI to give people the required information and to make AI-based assessments of their service needs. Thus, digitalisation considerably reduces the number of documents and declarations needed in the application process.

In most cases, the application process is done online. However, claimants who have no access to digital devices can start their application processes either by telephone, by post or by personal visit to a Kela office. For example, about 75% of all Kela applications are done online.

1.2.2.1 Unemployment benefits

The process described in Section 1.2.2 is also applicable to unemployment benefits.

1.2.2.2 Sickness and healthcare benefits

The process described in Section 1.2.2 is also applicable to sickness and healthcare benefits.

1.2.2.3 Maternity and equivalent paternity benefits

The process described in Section 1.2.2 is also applicable to maternity and paternity benefits.

⁵ Introduced in 1962.

1.2.2.4 Invalidity benefits

The process described in Section 1.2.2 is also applicable to invalidity benefits.

1.2.2.5 Old-age benefits and survivors' benefits

The process described in Section 1.2.2 is also applicable to old-age and survivors' benefits.

1.2.2.6 Benefits in respect of accidents at work and occupational diseases

The process described in Section 1.2.2 is also applicable to benefits in relation to work accidents and occupational diseases.

1.2.3 Simplification of the structures within the social protection administration

No structural reforms have been carried out. The structure of the social security administration has remained unchanged between 2017 and 2022 (see Figure 1). However, the Sote reform will change the structure. On 23 June 2021, the Finnish parliament accepted the bill on the Sote reform, giving counties responsibility for social care, healthcare and rescue services. The legislation will become fully effective on 1 January 2023. After the Sote reform, public administration will be organised at three levels: state, counties and municipalities. There will be 22 entities (21 welfare counties and the City of Helsinki) instead of the present 309 individual municipalities organising the services. Municipalities and counties will be jointly responsible for promoting population health. The aim is to homogenise the delivery of services within the country and create seamless service chains between the different sectors and different service-providers (Government of Finland, 2021).

1.2.3.1 Unemployment benefits

There was no simplification of the structures within the unemployment benefits system.

1.2.3.2 Sickness and healthcare benefits

There was no simplification of the structures within the sickness and healthcare benefits system.

1.2.3.3 Maternity and equivalent paternity benefits

There was no simplification of the structures within the maternity and paternity benefits system.

1.2.3.4 Invalidity benefits

There was no simplification of the structures within the invalidity benefits system.

1.2.3.5 Old-age benefits and survivors' benefits

There was no simplification of the structures within the old-age and survivors' benefits system.

1.2.3.6 Benefits in respect of accidents at work and occupational diseases

There was no simplification of the structures within the work accident and occupational disease benefits system.

2 Issues, debates and ongoing or planned reforms to ensure the information on, and to simplify access to, social protection for workers and the self-employed

2.1 Issues, debates and reforms related to information

The purpose of the subsequent sections is to shortly discuss issues related to the main information policies and practices in Finland. Furthermore, where there are assessments available on the impacts of these policies, they also will be described.

2.1.1 Issues

The issue is to what extent the aims specified in the Act on the Openness of Government Activities (1999/621; see Section 1.1) have been met in practice. Whereas the social security forms discussed in the section above are perhaps not that problematic, in social assistance there may be more problems to meet all the criteria stipulated by the legislation on a sufficient level of information and knowledge. In 2017, basic social assistance was transferred from the municipalities to Kela. This reduced non-take-up rates by harmonising the application process and making it more formal and less stigmatising (Hytönen, 2020). However, there are problems (see Section 2.2.1).

When the guarantee pension was implemented in 2011, Kela sent information letters on the new benefit encouraging people to apply for the pension. The follow-up study showed clear evidence that the intervention increased take-up and prompted pensioners to apply sooner (Paukkeri & Matikka, 2022).

In 2017, Finland reformed the earnings-related pension scheme. The reform introduced changes in retirement ages and accrual principles. Furthermore, pension ages were linked to life expectancy. A study of the knowledge of new pension rights showed great variations. Every fifth respondent knew exactly how to estimate their pension and was familiar with the effects of the life expectancy co-efficient and how working longer affects their pension. However, one fifth of the respondents could not estimate their pensions and were unfamiliar with the effects of the life expectancy co-efficient and with how working longer affects their pension. The rest had partial knowledge about the reform (Nivalainen & Tenhunen, 2018).

In the experimental survey related to the 2017 pension reform, the treatment group got an information letter on the characteristics of the reform, whereas the control group did not get any further information. The results showed that the information letter had a significant impact on the subjective but not on the objective level of knowledge. However, receiving the information letter improved acceptance and perceptions of the fairness of the reform (Kangas *et al.*, 2021)

Regarding encounters between the young unemployed and the social security system, there are things to improve. In their study of the issue, Helne and Hirvilammi (2021) concluded that the system is too bureaucratic and the unemployed do not always know which kind of benefits they are entitled to and what their rights and obligations are.

The concept of digital literacy pertains to various aspects of reading texts, interpreting the images, sounds and symbols transmitted by digital platforms. This development may cause serious difficulties for some members of society. One of these difficulties is related to language, or more precisely, to written texts, since institutional communication in modern societies is primarily based on written language. Information on social rights is based on legal language, which is complex because of its lexical, semantic and syntactic restrictions, for example. The complexity of legal language stems from the need for accuracy. However, an accurate but obscure legal document does not provide an understanding of the content of the text. Legal language may be difficult to comprehend for lay people in general, but particularly those who are in a vulnerable position – due to, for instance, illiteracy, lack of

proficiency in the language of the written document, young age or cognitive disabilities – have difficulties understanding the contents of legal documents.

There are several efforts to ensure simple and user-friendly access to information for all residents in general and for people with low digital skills and people with disabilities. For example, Kela (as do many other social security institutions) provides information via clear language practices. Furthermore, the information portals often provide examples of how to apply and how benefits are calculated in different situations and for different household types (for example: Kela, 2022). The clarification information is a continuum. Reformed texts and other information will never be finalised. Laws and systems are constantly changing. Therefore, information must be adapted to these changes.

Some experts try to seek alternatives for the obscurity of legal language by visualising social security and the application processes. An ongoing research project at Tampere University examines how social welfare documents can be translated into comic-style documents in a way that ensures that the documents are as unambiguous as possible and more accessible (see: Sarjis, 2022).

2.1.2 Debates

As indicated in Section 2.1.1, the main debates revolve around the relationships between different parts of social assistance, and the responsibilities between Kela, municipalities and employment offices. The central issue is how to make the division of labour between Kela and the municipalities clearer, and how to strengthen the links between basic social assistance, social and employment services.

As regards access to information, there are debates on the digital divide. As most of the information and application processes are digital, it is now a question of what will now happen to people who do not have a sufficient level of digital skills (i.e. digital literacy). There are two important aspects. The first aspect is the capacity to read and critically evaluate and understand what one has read. This aspect pertains to all information that is available in a digitalised form and through all possible digital channels. The other aspect is related to skills for digital writing and storytelling in digital forums. It becomes critical when traditional face-to-face services (such as access to social benefits, healthcare, and mental healthcare services) are digitalised and the clients must be able to digitally tell their stories (Koskiaho & Saarinen, 2019; Perttola, 2019).

The debates do not explicitly refer to the 2019 Council Recommendation.

2.1.3 Ongoing or planned reforms

The ongoing planning of the comprehensive social security reform (Sotu) pays attention to the simplification of the whole social security system. Simplification also improves the ability to provide sufficient information to clients (see Section 2.2.2). The same goes for the Sote reform.

As regards the utilisation of the possibilities opened by AI, the Aurora programme is designed to provide general, specific and personalised information to clients (see Sections 1.1.1 and 1.2.2).

In most cases, the reforms and developmental plans do not explicitly refer to the 2019 Council Recommendation. However, the Ministry of Social Affairs and Health (MSAH, 2021) states that the Sote reform (see Section 1.2.3) is the key measure with regard to the Recommendation. The reform is designed to increase people's awareness of their rights and responsibilities and create social dialogue on the content of social policies for the 2030s.

2.2 Issues, debates and reforms related to simplification

2.2.1 Issues

The reform of social assistance in 2017 separated the basic, supplementary and preventive parts of social assistance. Whereas Kela became responsible for the basic part, the supplementary and preventive parts remained within the competencies of municipalities. The problem is that it is not always clear if the municipality or Kela should be responsible for benefits. In particular, there are problems with the co-ordination of basic and supplementary parts. Furthermore, links between income transfers and social care and healthcare and employment services are criticised for being too weak, leading to situations where clients fall in between them and do not know which system they belong to.

2.2.2 Debates

The Finnish social security system is comprehensive but at the same time may be non-transparent and difficult to understand. Due to historical legacies, new schemes have been added on top of the existing ones. This process of layering has produced rather a complicated system, "a benefits jungle". On 19 March 2020, the Finnish government appointed a parliamentary committee to solve that problem and prepare for the comprehensive Sotu reform. The term of office of the committee will last from 23 March 2020 to 31 March 2027 (MSAH, 2020). The main task of the Sotu reform is to solve problems linked to basic social security, earnings-based benefits, and social assistance. The goal is to homogenise and harmonise basic security programmes administered by Kela and to improve the co-ordination between benefits in cash and benefits in kind, and make it more seamless. The reform will affect most of the Kela-based benefits and their co-ordination with earnings-related benefits and social care and healthcare services. No concrete reform plans have yet been presented. Therefore, it is impossible to say exactly how the Sotu reform will simplify the system and affect rules of processes within the social protection system.

See also Section 2.1.2.

2.2.3 Ongoing or planned reforms

See Sections 2.1.3 and 2.2.2.

2.3 Suggestions for improvements

In the Finnish social security system, there are lots of good, in some cases even excellent, features – including how personalised information is provided to clients, and how IT systems/applications are used to reduce the bureaucracy, documents and declarations needed in the application processes. However, there are problems and new problems will emerge related to new technologies and how personalised information could be best possible way to deliver to the clients. The service chain is not always seamless and instead of one-stop shops there are too often separate shops that the client must visit. As indicated, digitalisation and digital applications may cause problems for too many clients. More digital service points are needed to provide help to those whose digital skills are not adequate to obtain the information needed and the handling of their application processes.

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