

Coronavirus pandemic in the EU – Fundamental Rights Implications

Country: Estonia

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1 Measures taken by government/public authorities impacting on specific freedoms

Please briefly describe the main developments, between 1 September – 31 October 2020, in the legal framework and related measures adopted in your country in response to the Coronavirus pandemic with respect to emergency laws/state of emergency, freedom of assembly and freedom of movement.

1.1 Emergency laws/states of emergency

In **Estonia**, the government has not declared another state of emergency after the emergency situation which lasted from 12 March 2020 to 18 May 2020. The current measures related to the COVID-19 pandemic are adopted as government orders. The legal basis for the orders is the Communicable Diseases Prevention and Control Act Act (*Nakkushaiguste ennetamise ja tõrje seadus*), which was amended by the Parliament (*Riigikogu*) in May 2020. In addition, based on the same amendments, the Health Board (*Terviseamet*) now has the right to quarantine (unless the quarantine has a significant effect on the society or the economy), close establishments, prohibit public meetings and events, and take other measures necessary to prevent the spread of communicable diseases.¹

Failure to comply with the measures prompts the application of administrative coercive measures set out in the Law Enforcement Act (*Korraldusseadus*).² The maximum amount of the penalty payment is € 9600 and this penalty payment may be imposed repeatedly.³ There are no reports of punishments being applied in September and October 2020.

There have been no court judgments concerning the legality of emergency measures in September and October 2020. However, the Chancellor of Justice (*Õiguskantsler*) has issued opinions in response to complaints concerning various restrictions. For example, on 16 September 2020, the Chancellor of Justice issued a note to Peipsiääre local government, explaining that several points of their 15 September 2020 order “Implementation of measures to prevent the epidemic spread of coronavirus” restrict fundamental rights without a legal basis, such as requiring all service industry employees to wear masks, banning groups of more than two people in public places, and requiring people to keep at least two metres of distance from each other.⁴ On 17 September 2020, Peipsiääre local government responded that the problematic points of the order have been annulled.⁵

¹ Estonia, Parliament (*Riigikogu*), [Meditsiiniseadme seaduse, hädaolukorra seaduse ja teiste seaduste muutmise seadus 165 SE](#), 13 May 2020.

² Estonia, [Law Enforcement Act \(*Korraldusseadus*\) § 28 \(2\)-\(3\)](#), 23 February 2011.

³ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Restrictions on the freedom of movement and on holding public meetings and public events as necessary for preventing the spread of the COVID-19 disease \(*COVID-19 haiguse leviku tõkestamiseks vajalikud liikumisvabaduse ning avalike koosolekute pidamise ja avalike ürituste korraldamise piirangud*\)](#), 19 August 2020 (latest amendment in force as of 30 October 2020).

⁴ Estonia, Chancellor of Justice (*Õiguskantsler*), [Märgukiri Peipsiääre vallas SARS-CoV-2 viiruse leviku tõkestamiseks võetud meetmete suhtes](#), No 7-8/201491/2004979, 16 September 2020.

⁵ Estonia, Peipsiääre local government, [Vastus märgukirjale](#), No 2-5/1882-1, 17 September 2020.

1.2 Freedom of assembly

In **Estonia**, public meetings and events are allowed with certain restrictions. The organiser must ensure the scattering of people and not exceed the allowed number of participants – for indoor meetings, the allowed number is up to 750 people, and the venue is allowed to be filled up to 50% of its attendance capacity. The number was lowered from 1,500 people to 750 people on 29 September 2020. For outdoor events, the allowed number of participants is up to 2000 people, which has not been changed since 15 July 2020. The organiser must also ensure the availability of disinfectants and comply with the disinfection requirements according to instructions of the Health Board.⁶

Public religious services are allowed if the requirement of scattering of people is complied with and the availability of disinfectants and compliance with the disinfection requirements is ensured. For religious services, the order does not provide for a maximum number of people.⁷ Scattering of people means maintaining a “safe distance” between people, if possible, that distance should be two metres.⁸

While during the emergency situation the observance of social distancing rules was monitored by the police, then at the end of the emergency situation the government assigned this task to the Health Board. If police officers notice violations in the course of their regular work, they communicate with the people and explain the risks of public gatherings which violate the rules. In case of a continuous violation, the police officers forward the information to the Health Board, which can impose a penalty payment if necessary.⁹ There are no reports of such penalties being applied.

There are also no reports of any judicial complaints regarding freedom of assembly. However, on 24 September 2020, cultural organisations sent a joint proposal to state institutions regarding COVID-19 restrictions at cultural events. One of the highlighted suggestions was that new restrictions should never take effect earlier than 10 days after the decision is made public. Also, in the event that new restrictions are created, the organiser should have the right to complete previously advertised events, for example, if the organiser has sold 1,500 tickets to an event, it should not be expected to leave 750 people behind the door due to new restrictions. The proposal also included ideas for possible precautions, such as encouraging participants of events to wear masks.¹⁰

⁶ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Restrictions on the freedom of movement and on holding public meetings and public events as necessary for preventing the spread of the COVID-19 disease \(COVID-19 haiquse leviku tõkestamiseks vajalikud liikumisvabaduse ning avalike koosolekute pidamise ja avalike ürituste korraldamise piirangud\)](#), 19 August 2020 (latest amendment in force as of 30 October 2020).

⁷ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Restrictions on the freedom of movement and on holding public meetings and public events as necessary for preventing the spread of the COVID-19 disease \(COVID-19 haiquse leviku tõkestamiseks vajalikud liikumisvabaduse ning avalike koosolekute pidamise ja avalike ürituste korraldamise piirangud\)](#), 19 August 2020 (latest amendment in force as of 30 October 2020).

⁸ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Kehtivad piirangud ja nende leevendused](#), 18 October 2020.

⁹ Estonia, Police and Border Guard Board (*Politsei- ja Piirivalveamet*), [Koroonaviiruse tõttu kehtestatud piirangud, Inimeste hajutamise nõue](#).

¹⁰ Estonia, [Kultuurivaldkonna ühispöördumine ja ettepanekud viiruse leviku tõkestamiseks kultuurisündmustel](#), 24 September 2020.

1.3 Freedom of movement

In **Estonia**, entry into the country is allowed for citizens and residents of the European Union, the Schengen area, the United Kingdom, Andorra, Monaco, San Marino and Vatican, and their family members, if they show no symptoms of COVID-19.¹¹ In addition, entry is allowed for persons who are asymptomatic and arrive from a country published on the website of the Ministry of Foreign Affairs (Australia, Japan, New Zealand, Rwanda, South Korea, Thailand, Singapore and Uruguay).¹² Citizens of other countries are allowed to enter Estonia for the purpose of work or studies, provided that they show no symptoms of COVID-19.¹³

By way of an exception, entry is also allowed for asymptomatic foreigners whose spouse or a direct blood relative in the ascending or descending line is an Estonian citizen or a person with the right of residence in Estonia; or asymptomatic foreigners whose entry is justified under a special permit. The purpose of the special permit is to enable third-country nationals to enter Estonia especially for family reasons, such as funerals, weddings, illness of a family member, etc. The application for the permit can be found on the website of the Police and Border Guard Board.¹⁴

The Chancellor of Justice has received complaints from family member of foreign workers that the Police and Border Guard Board requires proof of legal basis for staying in Estonia, such as a visa, in order to issue the special permit for entry. However, according to the complaints, embassies do not accept visa applications from the family members unless they have already been granted the permission to enter by the Police and Border Guard Board. These complaints are still pending and the facts are being clarified.¹⁵

In addition, there are restrictions regarding air traffic – flights are only allowed to and from countries where the number of COVID-19 cases per 100,000 inhabitants in the last 14 days is less than twice of the EU average. Direct flights from outside the European Union are only allowed to and from Norway, Switzerland, Iceland, and countries listed in the Council of the European Union Recommendation.¹⁶ In the end of September 2020, the government amended the flight restrictions, but the manner in which the changes were made and communicated by the Ministry of Economic Affairs and Communications (*Majandus- ja Kommunikatsiooniministeerium*) received criticism from the Estonian Association of Travel Agents (*Eesti Turismifirmade Liit*) and the Chancellor of Justice. According to the Chancellor of Justice, the full text of the regulations was difficult to find and

¹¹ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Imposition of temporary restrictions on crossing the state border in order to prevent a new outbreak of the coronavirus SARS-CoV-2 causing the COVID-19 disease \(Riiqipiiri ületamise ajutine piiramine COVID-19 haigust põhjustava koroonaviiruse SARS-CoV-2 uue puhangu ennetamiseks\)](#), 18 May 2020 (latest amendment in force as of 14 September 2020).

¹² Estonia, Ministry of Foreign Affairs (*Välisministeerium*), [Information on countries and restriction on freedom of movement requirements for passengers](#), 23 October 2020.

¹³ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Imposition of temporary restrictions on crossing the state border in order to prevent a new outbreak of the coronavirus SARS-CoV-2 causing the COVID-19 disease \(Riiqipiiri ületamise ajutine piiramine COVID-19 haigust põhjustava koroonaviiruse SARS-CoV-2 uue puhangu ennetamiseks\)](#), 18 May 2020 (latest amendment in force as of 14 September 2020).

¹⁴ Estonia, Police and Border Guard Board (*Politsei- ja Piirivalveamet*), [Information on countries and self-isolation requirements for people arriving in Estonia](#).

¹⁵ Estonia, Chancellor of Justice (*Õiguskantsler*), Response to information request, 26 October 2020.

¹⁶ Estonia, Ministry of Economic Affairs and Communications (*Majandus- ja Kommunikatsiooniministeerium*), Information about flight restrictions ([Info lennupiirangu kohta](#)).

included insufficient reasoning, the date of entry into force was not clearly stated, not all stakeholders received the information, and the transitional period was not sufficient.¹⁷

After arriving in Estonia, quarantine obligation applies to people who have travelled from or through a COVID-19 risk country. The quarantine time was shortened from 14 days to 10 days on 29 October 2020.¹⁸ A COVID-19 risk country is considered to be a country with an infection rate of 50 cases per 100,000 inhabitants or higher. The data on infection rates is updated weekly on the website of the Ministry of Foreign Affairs (*Välisministeerium*).¹⁹

However, there are certain exemptions for asymptomatic people who have travelled to Estonia from Lithuania, Latvia or Finland, in case they have stayed in these countries for the past 14 days. Self-isolation is not required if the person coming from these countries has taken a COVID-19 test within 48 hours before their arrival in Estonia and the result is negative, or if the person arrives in Estonia for the purpose of working, studying, receiving health services, for family reasons, or transit. The obligation to self-isolate also does not extend to asymptomatic people who live in the city of Valga (Estonia) or Valka (Latvia) and who move within the boundaries of their local governments during their daily Estonian-Latvian border crossing.²⁰

From 1 September 2020, it is possible to get tested for COVID-19 at Tallinn airport and port in order to shorten the period of self-isolation. People are required to self-isolate completely until they receive their first test result. In case of a negative test result, the person must stay in limited self-isolation for another seven days, which means they can go to work and obtain essentials from a shop, but must avoid unnecessary contacts. A second test must be performed seven days after the results of the first test, if the results of this test are also negative, the person can resume their regular daily life. Testing is free of charge for Estonian citizens and residents, otherwise the cost is € 67.²¹

Anyone who tests positive for COVID-19 is required to quarantine, as well as persons living or permanently staying in the same residence with them, and persons who have otherwise been in close contact with them. Infected persons are prohibited from leaving their place of residence, except on the instructions of a health professional or a police officer, or in case of an emergency. The household members and persons who have been in close contact with the infected person may leave in more cases, such as for performing public duties, obtaining everyday essentials, or being outside while completely avoiding contact with other persons.²²

¹⁷ ERR (2020), '[Justice chancellor: Ministry messed up flight restriction changes](#)', 7 October 2020.

¹⁸ Estonia, Government of the Republic (*Vabariigi Valitsus*), '[The Government shortened the period of isolation applicable following border crossing and to persons with close contact with infected people](#)', 29 October 2020.

¹⁹ Estonia, Ministry of Foreign Affairs (*Välisministeerium*), '[Information on countries and restriction on freedom of movement requirements for passengers](#)', 30 October 2020.

²⁰ Estonia, Government of the Republic (*Vabariigi Valitsus*), '[Restrictions on the freedom of movement and on holding public meetings and public events as necessary for preventing the spread of the COVID-19 disease \(COVID-19 haiguse leviku tõkestamiseks vajalikud liikumisvabaduse ning avalike koosolekute pidamise ja avalike ürituste korraldamise piirangud\)](#)', 19 August 2020 (latest amendment in force as of 30 October 2020).

²¹ Estonia, Ministry of Foreign Affairs (*Välisministeerium*), '[Information on countries and restriction on freedom of movement requirements for passengers](#)', 30 October 2020.

²² Estonia, Government of the Republic (*Vabariigi Valitsus*), '[Imposition of quarantine on persons diagnosed with the COVID-19 disease caused by the coronavirus SARS-CoV-2 and on persons living with or permanently staying in the same place of residence as them and on persons who have otherwise had close contact with a person diagnosed with the disease \(Karantiini kehtestamine koroonaviirusest SARS-CoV-2 põhjustatud COVID-](#)

2 Implications of Covid-19 and measures to contain it on specific social rights

Please provide information on legislation/measures taken by the government/public authorities, between 1 September – 31 October 2020, in response to COVID-19 that have impacted negatively on relevant social rights with respect to two of the following areas of life: education, work, health care and housing.

2.1 Education

In **Estonia**, the government has advised educational institutions to continue their work as normally as possible, while taking the necessary precautions (hygiene measures, social distancing) against COVID-19. The Ministry of Education and Research (*Haridus- ja Teadusministeerium*) together with the Health Board has issued recommendations for educational institutions, parents, and students. According to the recommendations, each educational institution must consider how to mitigate the risks related to the pandemic, taking into account that contact teaching should be provided for as long as possible to younger students and students in need of additional support. If an educational institution has a case of COVID-19, the Health Board assesses the situation and considers the measures to be taken, including the need to close the institution and continue studies via distance learning.²³

From 14 September 2020, Tallinn city government ordered schools to organise partial distance learning for students in the eighth grade and above. Members of the national government, government's scientific council and parents have accused Tallinn city government of overreacting. The Minister of Education described Tallinn city government's order as problematic and disproportionate, suggesting to use libraries and hotel conference rooms to disperse students instead.²⁴

The Chancellor of Justice has drawn attention to the need to ensure that the organisation of distance learning has a clear framework and that the fundamental right of students to quality education is guaranteed, after receiving complaints from parents that students do not receive the necessary guidance from the teacher during distance learning.²⁵ On 29 October 2020, the Chancellor of Justice sent a letter to the Ministry of Education and Research, requesting an investigation into the legality of distance learning. The Chancellor of Justice outlined that there is no such concept in the legislation as distance learning, and schools have very different approaches to organising this type of learning. It is not clear how the learning of children with special support needs is organised during distance learning and whether it meets the needs of these children. The Chancellor of Justice stressed that it is important to assess the content of distance learning in schools to avoid the

[19 haiguse diagnoosiga isikutele, nende isikutega koos elavatele või samas elukohas püsivalt viibivatele või haiguse diagnoosiga isikuga muul viisil lähikontaktis olnud isikutele](#)), 1 October 2020.

²³ Estonia, Ministry of Education and Research (*Haridus- ja Teadusministeerium*), [Haridus- ja Teadusministeeriumi ning Terviseameti soovitusel õppetöö korraldamisel koroonaviiruse leviku tingimustes](#), 22 September 2020.

²⁴ ERR (2020), '[Education minister: Tallinn school measures disproportionate](#)', 11 September 2020.

²⁵ ERR (2020), '[Aigi Kivioja: distantsõppest põhiseaduse valguses](#)', 27 September 2020.

situation that by the end of the academic year, students have not acquired the necessary knowledge and skills.²⁶

Problems with access to the necessary means to engage in distance learning are dealt with case-by-case basis between the schools and the students. If necessary, students can borrow IT equipment from their schools. According to the Ministry of Education and Research, the feedback from schools has indicated that computers are generally available, but video equipment is often lacking. It has also been pointed out that if there are many children in the family, not every child has their own computer. If schools lack the necessary equipment to provide for the students, school administrators can participate in procurements organised by the Education and Youth Authority (Harno) to acquire IT equipment.²⁷

2.2 Health care

In **Estonia**, COVID-19 testing is provided for free with a referral from a family doctor. The need for testing is determined by the family doctor based on guidelines agreed jointly by family doctors and the Health Board. People who do not have a family doctor, including foreigners, need to turn to the closest family medicine centre. Turning to a doctor with symptoms of any respiratory disease has been equated with emergency care and is paid for by the Estonian Health Insurance Fund (*Eesti Haigekassa*).²⁸

According to the guidelines prepared by the Health Board, on weekends and public holidays all patients with symptoms of upper respiratory disease can receive a referral for COVID-19 testing through the family doctor helpline (1220). The helpline also serves patients in English daily from 3 to 5 pm. If the healthcare professional decides that coronavirus testing is necessary, they will send an electronic order to the laboratory and the patient will be called to agree on a time and place for the testing. In most cases the results are known within two working days.²⁹ Since demand for testing is high, testing times are occasionally given a day or two after calling. Many doctors have started taking tests themselves to combat the demand. In this case, the results are mostly available the same day or the day after.³⁰

There have been reports of some confusion around the testing of asymptomatic persons. The head of the government's scientific advisory council has recommended that every asymptomatic person who has been in close contact with someone diagnosed with COVID-19 should get tested³¹, but there have been reports that not all family doctors agree to provide a referral to persons without symptoms.³²

People arriving at Tallinn airport or port can take their test on the spot. The testing sites are open until the last passenger by boat or plane has arrived. People arriving from a COVID-19 risk country by any other type of transport can get tested by booking a time at the testing centres. Priority is given

²⁶ Estonia, Chancellor of Justice (*Õiguskantsler*), [Ettepanek järelevalve algatamiseks \(7-5/201561/2005828\)](#), 29 October 2020.

²⁷ Estonia, Ministry of Education and Research (*Haridus- ja Teadusministeerium*), Response to information request, 3 November 2020.

²⁸ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Testing for the virus](#).

²⁹ Estonia, Health Board (*Terviseamet*), Response to information request, 29 October 2020.

³⁰ ERR (2020), '[Koroonatestile saamiseks võib pöörduda lähima tohtri või nõuandeliini poole](#)', 20 September 2020.

³¹ ERR (2020), '[Lutsar: sümptomiteta lähikontaktset peaksid testima minema](#)', 29 October 2020.

³² Jazepov, T. (2020), '[Laske testima!](#)', *Õhtuleht*, 30 October 2020.

to those with symptoms of the virus, waiting time is usually one to two days. The test is free for people with an Estonian ID-code, foreign nationals need to pay € 67.³³

In autumn 2020, the provision of regular health care services has not been restricted.³⁴ However, the Health Board has expressed regret that some doctor's appointments have been delayed up to a week due to the requirement to perform a COVID-19 test before the appointment.³⁵

There have been a few reports of health workers getting infected with COVID-19. On 6 November 2020, it was reported that three employees at Hiiumaa Hospital and two employees at Hiiumaa family doctor's centre have tested positive for COVID-19. The work of the hospital has been reorganised and all the medical staff is being tested.³⁶ According to the Health Board, there are over five family doctor's centres where COVID-19 has been detected, however, these are single cases rather than clusters, which is why each individual case has not been reported.³⁷

There have been no reports of delays in the treatment of COVID-19 patients. The hospitals still have the capacity to take in new patients, however, the Chief Physician at the North Estonia Medical Centre Foundation has expressed concern over the increase of intensive care patients.³⁸

Since September 2020, several hospitals have applied a prohibition on visitations, such as the North Estonia Medical Centre, Läänemaa Hospital and Ida-Viru Central Hospital.³⁹

3 Negative impact on social rights for vulnerable groups including measures to address this

Please select and provide information concerning two groups whose social rights were particularly negatively impacted with respect to developments/measures adopted in relation to COVID-19, between 1 September – 31 October 2020. For each of the two groups selected – highlight which social rights were most impacted. Also, identify any government and related measures that were introduced to alleviate the negative impact on these groups.

3.1 Persons with disabilities

In **Estonia**, in September 2020, the Commissioner for Gender Equality and Equal Treatment (*Soolise võrdõiguslikkuse ja võrdse kohtlemise volinik*) reported receiving several complaints about specific workplaces and schools banning their employees and students from coming to work or school in a situation where the person has a chronic disease with symptoms similar to COVID-19. The Commissioner explained that if the disease is not contagious and the person is able to study or work,

³³ Estonia, Government of the Republic (*Vabariigi Valitsus*), [Testing for the virus](#).

³⁴ Estonia, Health Board (*Terviseamet*), Response to information request, 29 October 2020.

³⁵ Müller, A. (2020), '[Terviseamet: saatekirjade arvu kasv on tekitanud testimisjärjekordi](#)', *ERR*, 11 September 2020.

³⁶ Adamson, S. (2020), '[Hiiumaal on olukord kriitiline: nakatunuid on nii haiglas, perearstikeskuses kui ka koolis](#)', *Delfi*, 6 November 2020.

³⁷ Hussar, K. (2020), '[Tallinna perearstikeskuses tuvastati koroonaviirus, seitse arsti ja mitu õde on isolatsioonis](#)', *Delfi*, 6 November 2020.

³⁸ ERR (2020), '[PERHi ülemarst: oleme viiruse leviku pärast mures](#)', 9 November 2020.

³⁹ ERR (2020), '[PERH kehtestas patsientide külastuskeelu ja maskikohustuse](#)', 16 September 2020; Lääne Elu (2020), '[Läänemaa haigla kehtestas külastuskeelu](#)', 15 September 2020; Pealinn (2020), '[Ida-Viru Keskhaigla viis töötajad on nakatunud koroonaviirusesse](#)', 10 September 2020.

there is no real reason to isolate the person. Even though staying at home is still recommended if there is any chance the symptoms may be caused by the virus, this does not apply if the person has a chronic illness which they know is not infectious. According to the Commissioner, this kind of isolation may be considered discrimination on the grounds of disability.⁴⁰

According to the Estonian Chamber of Disabled People (*Eesti Puuetega Inimeste Koda*), support for people with special needs was not sufficient during the COVID-19 crisis in the spring. The Chamber organised a mini-survey regarding the situation of people with disabilities during the pandemic. The respondents described issues such as unemployment, problems caused by the closure of the education system, interruption of the provision of rehabilitation services, closure of support centres.⁴¹ According to the Estonian Chamber of Disabled People, these issues have not arisen again in the autumn so far, as schools are mostly still open and necessary social services are provided.⁴²

3.2 Older people

In **Estonia**, the pandemic has disadvantaged the position of older people in the labour market. In September 2020, job portal CV-Online published the results of a survey examining the participation of the older age group in the labour market during the pandemic. More than a thousand people over the age of 55 were asked to assess whether the labour market for the elderly has changed compared to the pre-crisis period. One third of the respondents highlighted a significant increase in competition in the labour market, as the total number of job offers has decreased. Older people see that younger people are preferred and people aged over 55 are automatically excluded in the first round. It was pointed out that many positions that have traditionally been the domain of older people, such as working in museums and tourist sites, security work or translation, have been made redundant. Another concern highlighted by the respondents, particularly the ones in the age group 63+, was the unexpected need to use modern information technology to work from home. According to the respondents, better skills for coping with remote work give younger people a strong advantage in the labour market.⁴³

Regarding older people in care homes, the Health Board aims to avoid closing the institutions, since in the spring it was clear that it was mentally exhausting for the elderly.⁴⁴ However, some care homes have prohibited visitations also in the autumn, as in each specific care home the head of the institution decides on the necessary measures to prevent the spread of the virus. The Chancellor of Justice has received complaints about the visitation bans in specific care homes and confirmed that it is up to the care homes to decide on the measures for keeping their residents safe, however, also recommended that care homes should introduce alternative means of communication for the elderly and their relatives, such as telephone and/or video calls, letters, parcels, etc.⁴⁵

⁴⁰ Õhtuleht (2020), '[LIIGNE NAKKUSEHIRM! Pakosta: kroonilisi haigeid ei tohi põhjusega isoleerida!](#)', 24 September 2020.

⁴¹ Jaakson, T. (2020), '[Koja hinnangul ei tagatud kevadel erivajadustega inimeste toimetulekut](#)', ERR, 16 September 2020.

⁴² Estonia, Estonian Chamber of Disabled People (*Eesti Puuetega Inimeste Koda*), Response to an information request, 30 October 2020.

⁴³ Koovit, K. (2020), '[Üle 55-aastased tunnevad tööturul olukorra halvenemist. Osad tööandjad kasutavad palga langetamiseks alatuid võtteid](#)', Delfi Ärileht, 22 September 2020.

⁴⁴ Delfi (2020), '[Terviseameti ekspert ütleb, et hooldekodusid kinni ei panda, sest kevadise otsuse mõju ei olnud hea](#)', 30 October 2020.

⁴⁵ Estonia, Chancellor of Justice (*Õiguskantsler*), Response to information request, 26 October 2020.