

Coronavirus pandemic in the EU – Fundamental Rights implications

National vaccine deployment

Finland

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1 National vaccine deployment – planning and overview of priority groups

Please provide the title and hyperlink of the national vaccine deployment plan/s in EN and the national language/s and indicate the date of publication of the plan/s including any updates.

Please provide information on the planned phases of vaccination with respect to the groups to be prioritised for vaccination.

Specific groups identified in the national vaccine deployment plan	Date of plan	Date of revised plans
	<p>22/12/2020</p> <p>Government Decree on voluntary COVID-19 vaccines (Decree No. 1105/2020), entered into force on 23 December 2020</p> <p><u>(Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista/Statsrådets förordning om frivilliga covid-19-vaccinationer)</u></p> <p><u>Vaccination order for risk groups</u>, published on 5 February 2021 by the Finnish Institute for Health and Welfare (<i>Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd</i>)¹</p> <p><u>(Riskiryhmien koronarokotusten järjestyksen/Vaccinationsordning för personer som är mottagliga för allvarlig coronavirus-sjukdom)</u></p>	<p>16/4/2021</p> <p>Amendment of the Government Decree on voluntary COVID-19 vaccines (Decree No. 307/2021), entered into force on 19 April 2021</p> <p><u>(Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista annetun valtioneuvoston asetuksen muuttamisesta ja väliaikaisesta muuttamisesta/Statsrådets förordning om ändring och temporär ändring av statsrådets förordning om frivilliga covid-19-vaccinationer)</u></p> <p>Amendment of the Government Decree on voluntary COVID-19 vaccines (Decree No. 308/2021), entered into force on 19 April 2021</p> <p><u>(Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista annetun valtioneuvoston asetuksen 2 §:n muuttamisesta/Statsrådets förordning om</u></p>

¹ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [THL on tarkentanut lääketieteellisiä riskiryhmiä koronarokotuksia varten](#), press release, 5 February 2021.

		<u>ändring av 2 § i statsrådets förordning om frivilliga covid-19-vaccinationer</u>
<i>older persons; indicate age groups specified</i>	YES (2) Ages 70+, starting with the oldest	YES (4) Vaccinations of persons below 70 are conducted in the following age groups starting with the oldest: 60-69, 50-59, 40-49, 30-39 and 16-29.
<i>persons with underlying health problems</i>	YES Reference to specific health conditions divided into highly predisposing and predisposing to severe COVID-19 (3) Priority given to all with highly predisposing conditions, then persons with predisposing conditions.	NO
<i>persons with disabilities</i>	YES Reference to persons with Down syndrome, defined as highly predisposed to severe forms of COVID-19 (see above) (3)	NO
<i>key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers</i>	YES Reference to specific job profiles including health workers (1) and care home workers (1)	NO
<i>persons belonging to ethnic/national minorities</i>	NO	NO
<i>persons experiencing homelessness</i>	NO	NO
<i>persons with drug addiction dependencies</i>	NO	NO
<i>persons with low literacy levels</i>	NO	NO
<i>persons deprived of their liberty</i>	NO	NO
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	NO	NO

<p><i>OTHER – not specified above; e.g. ‘Persons living in crowded accommodation’; etc. Please insert . . .</i></p>	<p>YES Reference to older persons living in housing service units and institutional care units (1)</p> <p>At the discretion of municipalities, caregivers living in the same household as a prioritized person (2-3), can receive the vaccination at the same time.²</p>	<p>YES Reference to members of advance voting commissions in the municipalities and election officials arranging at-home voting and voting in care units (1)</p>
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Please briefly indicate here (not in the above table):

- the reasons behind major changes with regard to priority groups– as announced by the government.
- the overall approach behind the definition of priority groups: please identify the main ground for identifying groups as priority group (vulnerability to infection; social vulnerability; multiple criteria).

In **Finland**, the government stipulates that the main objectives of the COVID-19 vaccinations are to decrease the number of persons falling ill, prevent deaths and shortened longevity, and secure the capacity of the health care system.³ Consequently, the priority groups are health care staff in charge of caring for persons suffering from COVID-19, and groups most vulnerable to serious forms of COVID-19 infections.

The government has amended the order of priority for COVID-19 vaccinations on 16 April 2021.⁴ In addition to specifying the vaccination order of persons below the age of 70 (see table above), the amendment introduces the possibility, on epidemiological grounds, to temporarily target the allocation of vaccines by region (Section 2a).⁵ This requires that the COVID-19 incidence per 100,000 inhabitants

² Finland, Government (valtioneuvosto/statsrådet), [Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista](#), Memorandum, 22 December 2020, p. 5.

³ Finland, Government (valtioneuvosto/statsrådet), [Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista](#), Memorandum, 22 December 2020, p. 1.

⁴ Finland, Ministry of Social Affairs and Health (sosiaali- ja terveystieteiden ministeriö/social- och hälsovårdsministeriet), '[Order of priority for COVID-19 vaccinations to be specified – changes to right to administer vaccines](#)', press release, 16 April 2021.

⁵ Finland, Government Decree No. 307/2021 ([Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista annetun valtioneuvoston asetuksen muuttamisesta ja väliaikaisesta muuttamisesta/Statsrådets förordning om ändring och temporär ändring av statsrådets förordning om frivilliga covid-19-vaccinationer](#)), 16 April 2021.

in the respective regional hospital district (*sairaanhoitopiiri/sjukvårdsdistrikt*) during the previous 14 days is at least 100. According to the legislative amendment, the distribution of vaccines to hospital districts with a high incidence is calculated based on the number of inhabitants, the number of COVID-19 cases and the number of patients in specialised healthcare during the previous 14 days.⁶ However, the re-allocated vaccines can be disbursed only after all people over 70 years of age and all those belonging to risk groups have had the opportunity to receive their first injection. The decree enters into force on 19 April 2021 and the provision on regional targeting remains in force until 31 May 2021.

In **Finland**, municipal elections will be organised on 13 June 2021. In order to safeguard the safety of election officials participating in the arrangement of advance voting in private homes and care units, an amendment to the vaccination order was made to this effect on 16 April 2021 (see table above).⁷

2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations

For each of the subsequent questions (2.1, 2.2 and 2.3) please indicate:

Languages: If information in different languages is available. Please list those languages in which information is available (e.g. languages of recognised national or ethnic minorities and immigrant communities; as well as English and other dominant international languages).

Accessibility for persons with disabilities: If information is provided in accessible formats to ensure accessibility for people with disabilities (including easy read, braille, sign language etc); are physical venues made accessible for persons with disabilities?

⁶ Finland, Ministry of Social Affairs and Health (*sosiaali- ja terveystieteiden ministeriö/social- och hälsovårdsministeriet*), '[Order of priority for COVID-19 vaccinations to be specified – changes to right to administer vaccines](#)', press release, 16 April 2021.

⁷ Finland, Government Decree No. 308/2021, ([Valtioneuvoston asetus vapaaehtoisista covid-19-rokotuksista annetun valtioneuvoston asetuksen 2 §:n muuttamisesta/Statsrådets förordning om ändring av 2 § i statsrådets förordning om frivilliga covid-19-vaccinationer](#)), 16 April 2021.

2.1 Channels, means and measures to inform about the national vaccination plan

Please provide information on channels, means and measures taken by the government or public authorities to inform the public about the national vaccination plan, its rollout strategy and vaccination awareness raising campaigns; e.g. traditional postal letters; online information; telephone calls; public information campaigns etc.

In **Finland**, the government, the Ministry of Social Affairs and Health (*sosiaali- ja terveystieteiden ministeriö/social- och hälsovårdsministeriet*) and the Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*) inform the public of the national vaccine strategy and order of priority in vaccinations in press conferences and webcasts. These are interpreted into Finnish and Swedish sign language. On the government website topical material on the COVID-19 situation is available in Finnish, Swedish and the Sámi languages as well as English, Russian, Estonian and Arabic (the biggest foreign-language speaking groups in Finland).⁸

The Finnish Institute for Health and Welfare provides on its website information, instructions and materials on coronavirus, vaccines and vaccination progress. The information is available in Finnish and Swedish, the Sámi languages, Finnish Romani, easy read Finnish and Swedish, sign language as well as a number of foreign languages.⁹ The Finnish Institute for Health and Welfare has also produced Youtube videos informing the public of the vaccinations and encouraging them to get the vaccine when it is their turn. In addition, it has arranged webcasts where the public can ask about COVID-19 vaccines, vaccinations and the order of priority in vaccinations.

Municipalities provide information of the practical arrangements of the vaccinations on their websites and social media as well as local newspapers. Such information is in the majority language of the municipality, Finnish or Swedish, in bilingual municipalities in both Finnish and Swedish, and in Sámi homeland in Finnish and the Sámi language(s). Easy read or sign language material is rare. However, municipalities refer to the website of the Finnish Institute for Health and Welfare (see above) for additional information. Several municipalities have on their website information on coronavirus vaccinations in English, some also in Russian, Estonian and Arabic. For example, the cities of Jyväskylä, Turku and Oulu

⁸ Finland, Government (*valtioneuvosto/statsrådet*), [Monikieliset korona-aineistot](#), website.

⁹ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Coronavirus COVID-19 – latest updates](#), [Vaccines and coronavirus](#) and [Koronatietoa eri kielillä](#), websites.

have separate websites with information on vaccinations for immigrants in several foreign languages.¹⁰

2.2 What are the (pre-) registration channels for vaccination put in place?

a) What registration channels for vaccination are in place e.g. websites, apps, hotlines/call centres, letters, via family doctors, etc.?

In **Finland**, municipalities are responsible for arranging the coronavirus vaccinations in their areas, following the national vaccination plan. Vaccinations are given by appointment only. The practice in reserving appointments varies between municipalities. As a rule, appointments can be made by phone or via an electronic appointment service. In March-April, vaccinations focus on elderly persons (ages 70+) and those belonging to a risk group due to a specific health condition (see above section 1). In many municipalities, persons in these groups are contacted by letter, phone call or text message to inform them of the vaccination schedule or to offer an appointment for vaccination.

b) Are any alternatives to digital access to vaccine registration in place e.g. appropriate support for those who need it (such as the elderly; those without access to the internet); physical locations for registration etc?

In **Finland**, elderly persons (ages 70+) and those belonging to a risk group due to a specific health condition are contacted by phone or text message and offered an appointment for vaccination (see above section 2.2.a). Based on the information on their websites, some municipalities explicitly mention the possibility for hearing or speech impaired persons to make an appointment by text message.

The Finnish Association of the Deaf (*Kuurojen Liitto/Finlands dövas förbund*) has expressed concern of the fact that some municipalities use a callback service which is not accessible to those with a hearing impairment. On 31 March, the association

¹⁰ Finland, websites of the city of Jyväskylä, [Information about coronavirus and vaccines in different languages](#); the city of Turku, [Information on Corona and Support for Immigrants](#); and the city of Oulu, [Multicultural Centre Villa Victor](#).

announced that its regional workers are ready to assist persons with a hearing impairment in booking appointments for vaccinations.¹¹

2.3 How are the vaccinations administered?

a) *Where are the vaccinations administered e.g. vaccination centres, via mobile units, via family doctors, etc.?*

In **Finland**, vaccinations are administered in health-care centres or in large vaccination centres put in place, for example, in fair centres, indoor sports arenas or schools. Temporary vaccination points have also been set up, for example, at shopping malls, city halls, parish halls and a bus station. The city of Jyväskylä has a mobile vaccination unit available on a case-by-case basis for persons who for severe health reasons cannot come to the vaccination point.

Following the vaccination strategy, elderly care residents have been offered the vaccine on-site in the care facilities. Elderly home care clients are vaccinated either at home or at vaccination centres, depending on their mobility and physical condition. Health care personnel caring for coronavirus patients as well as personnel in care facilities are offered the vaccine at their work place.

Health centres and the large vaccination centres are usually accessible and there are also staff or volunteers available to assist mobility impaired persons.

b) *For those being vaccinated - how is information about the actual vaccination process, the vaccine and any potential side effects provided?*

In **Finland**, municipalities publish on their websites information for those arriving to be vaccinated as well as information on the vaccines and their potential side effects (see also above section 2.1). The Finnish Institute for Health and Welfare and the Finnish Medicines Agency (Fimea) (*Lääkealan turvallisuus- ja kehittämiskeskus/Säkerhets- och utvecklingscentret för läkemedelsområdet*) provide information on the vaccines, their safety and the suspected adverse effects on their websites.¹²

¹¹ Finland, the Finnish Association of the Deaf (*Kuurojen Liitto/Finlands dövas förbund*), [Aluetyöntekijät auttavat koronarokotusaikojen varaamisessa](#), news release 31 March 2021, available in Finnish, Swedish and in sign language.

¹² Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Vaccines and coronavirus](#), website; Finnish Medicine Agency (*Lääkealan turvallisuus- ja kehittämiskeskus/Säkerhets- och utvecklingscentret för läkemedelsområdet*), [Koronarokotteiden haittavaikutusilmoitukset](#), website.

At the vaccination points, clients are told about potential side effects before the vaccination is given. After the vaccination, they receive a document which contains the date of vaccination, the name of the vaccine and information on possible side effects and treatment of symptoms. Such forms are available for the use of the medical personnel on the website of the Finnish Institute for Health and Welfare in Finnish, easy read Finnish, Swedish, English, Russian, Arabic and Somali.¹³

- c) Are there any circumstances where fees are applicable for receiving the vaccine – e.g. for third country nationals?

In **Finland**, COVID-19 vaccinations are part of primary public healthcare and they are offered free of charge for all people living in the country.¹⁴ Because of the current shortage of COVID-19 vaccines, they are not yet available in the private healthcare sector for a charge. Municipalities are responsible for arranging the vaccinations and offer the vaccine to their residents.

On 10 March, the Ministry of Social Affairs and Health issued a recommendation in which it is suggested that municipalities provide COVID-19 vaccines also to persons who do not have a permanent municipality of residence in Finland or other right to receive preventive healthcare services.¹⁵ This would include, for example, diplomats, students from third countries, asylum seekers and undocumented migrants. However, the recommendation does not apply to those staying in Finland for a short time only, such as travellers.¹⁶ This is a recommendation so it is up to the municipalities to decide whether they offer the vaccine also to other than permanent residents. For example, the city of Rovaniemi informed on 25 March that it would extend the vaccinations to persons residing in Rovaniemi who do not have a municipality of residence or other right to receive preventive health care in Finland.¹⁷

¹³ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Materiaaleja rokottamisen avuksi](#), website.

¹⁴ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Oma koronarokotus: miten, miksi ja milloin?](#), website.

¹⁵ Finland, Ministry of Social Affairs and Health (*sosiaali- ja terveystieteiden ministeriö/social- och hälsöförvårdsministeriet*), [Kuntainfo: covid-19-rokotuksia suositellaan henkilöille, joilla ei ole kotikuntaa Suomessa](#), press release, 10 March 2021.

¹⁶ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Oma koronarokotus: miten, miksi ja milloin?](#), website. InfoFinland website, published by the city of Helsinki, [Municipality of residence in Finland](#), 28 May 2020.

¹⁷ Finland, city of Rovaniemi, [You can get the vaccine even if you do not have a municipality of residence in Finland](#), news release, 25 March 2021.

3 Challenges and promising practices

3.1 Challenges

In **Finland**, disability rights organisations have repeatedly demanded that personal assistants and family carers of persons with disabilities should be included in priority groups for vaccination and get vaccinated at the same time with the person they are assisting and/or taking care of.¹⁸ The organisations emphasise that the assistance these people provide to persons with disabilities is equally important than the care that public sector health and social care personnel provide for persons in institutional and/or home care. They have referred to various risks posed to persons with disabilities through the close contacts with care providers, reminding the government of its obligation, set out in Article 11 of CRPD, to ensure the protection and safety of persons with disabilities in situations of risk.¹⁹ In the context of the recent amendments to the COVID-19 vaccine decree²⁰ (Decree No. 307/2021, please see above) and thereto related recommendations, however, no new priority groups were acknowledged and the vaccinations are being continued according to age groups.²¹ Not prioritising home carers of persons with disabilities, in particular, would seem to put people with disabilities belonging to risk groups in an unequal position as compared to people belonging to risk groups based on age, since family carers of elderly people can get the vaccine at the same time with the person they provide care to.²²

In **Finland**, the Deputy Parliamentary Ombudsman (*apulaisoikeusasiamies/ biträdande justitieombudsmannen*) has drawn attention to the heightened risks from coronavirus that temporary accommodation circumstances cause for people experiencing homelessness and stated that these risks should be taken into

¹⁸ Finnish Association of People with Physical Disabilities (*Invalidiliitto/Invalidförbundet*), [Henkilökohtaisille avustajille ja omaishoitajille myös koronarokote](#), news release, 26 February 2021, Union of the Employers of Personal Assistants in Finland (*Henkilökohtaisten avustajien työntekijien liitto, Heta-liitto/Heta-förbundet för personliga assistenters arbetsgivare i Finland*), [Henkilökohtaiset avustajat on lisättävä rokotusjärjestykseen](#), news release, 9 March 2021.

¹⁹ Union of the Employers of Personal Assistants in Finland (*Henkilökohtaisten avustajien työntekijien liitto, Heta-liitto/Heta-förbundet för personliga assistenters arbetsgivare i Finland*), [Heta vastasi lausuntopyyntöön rokotusasetuksen muuttamisesta](#), news release, 14 April 2021.

²⁰ Finland, Amendment of the Government Decree on voluntary COVID-19 vaccines (Decree No. 307/2021), entered into force on 19 April 2021.

²¹ Finland, Finnish Institute for Health and Welfare (*Terveyden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [Vaccination order and at-risk groups for COVID-19](#), updated 16 April 2021.

²² This specific issue, however, has not been raised by any organisations or equality bodies, nor in the complaints to the Parliamentary Ombudsman.

account for vaccination.²³ According to the Deputy Ombudsman, this should be done, especially, when a homeless person her/himself is unable to control her/his own situation and has an illness which weakens the immune resistance and the person's ability to protect her/himself. The Ombudsman also notes that the same concerns all people whose permanent or temporary care takes place in circumstances where the number of contacts has unavoidably risen. The statement was given in the context of an Ombudsman's own initiative investigation into homeless people's social and health care services in the emergency conditions, for which the Ombudsman had requested clarifications from several municipalities.²⁴

The **Finnish** Parliamentary Ombudsman (*oikeusasiamies/justitieombudsmannen*) has received over 60 complaints regarding COVID-19 vaccinations as of 22 April 2021.²⁵ Most of them concern the use of AstraZeneca's COVID-19 vaccine for 65–69-year-old persons. Several complainants allege this to amount to discrimination based on age and/or violating the equality principle and/or the patient's right to self-determination guaranteed in section 6 of the Act on the status and rights of patients (*laki potilaan asemasta ja oikeuksista/lagen om patientens ställning och rättigheter*, Act No. 785/1992).²⁶ On 22 April 2021, the Finnish Institute for Health and Welfare, however, decided that people in the age group 65–69 years may choose which vaccine they want, which has resolved the issue.²⁷

²³ Finland, Deputy Parliamentary Ombudsman (*apulaisoikeusasiamies/biträdande justitieombudsmannen*), [Asunnottomien sosiaali- ja terveystalvelut sekä asunnottomuuden vähentäminen poikkeustilan aikana](#), Decision No. EOAK/2446/2020, 5 March 2021, p. 3.

²⁴ Finland, Deputy Parliamentary Ombudsman (*apulaisoikeusasiamies/biträdande justitieombudsmannen*), [Asunnottomien sosiaali- ja terveystalvelut sekä asunnottomuuden vähentäminen poikkeustilan aikana](#), Decision No. EOAK/2446/2020, 5 March 2021.

²⁵ Finland, information obtained from the office of the Parliamentary Ombudsman (*oikeusasiamies/justitieombudsmannen*) via phone and e-mail on 22 April 2021.

²⁶ Finland, [Act on the status and rights of patients \(laki potilaan asemasta ja oikeuksista/lagen om patientens ställning och rättigheter\)](#), Act No. 785/1992).

²⁷ Finland, Finnish Institute for Health and Welfare (*Terveystieteiden ja hyvinvoinnin laitos/Institutet för hälsa och välfärd*), [mRNA-koronarokotteita voidaan antaa toukokuusta lähtien kaikille rokotettaville ikäryhmille – Astrazenecan rokotteen ikäraja pysyy ennallaan](#), press release, 21 April 2021.

3.2 Promising practices

In February 2021, it was published that a **Finnish** nurse had succeeded in developing a technique to obtain seven doses of vaccine from one Pfizer vaccine vial, instead of the five doses guaranteed by Pfizer.²⁸ The technique has been approved both by the Finnish Institute for Health and Welfare and Pfizer.²⁹ A video demonstrating the technique in detail has been made available by the city of Helsinki.³⁰ The technique has been useful in enabling more people to get vaccinated, particularly in situations of vaccine delivery delays.

²⁸ Media sources: Euractiv, [Finnish nurse extracts 7 doses from Pfizer vial](#), news release, 2 February 2021 and Reuters, [Finnish nurse squeezes extra vaccine doses with air-bubble technique](#), news release, 7 April 2021.

²⁹ Mediasource: Medi uutiset, [IL: Suomalaishoitaja keksi uuden tavan käyttää koronarokotetta – THL ja Pfizer hyväksyvät annoksia lisäävän menettelyn](#), 1 February 2021.

³⁰ City of Helsinki (Helsingin kaupunki), [rokoteannoksen laimentaminen](#).