By email

[cedaw@ohchr.org](mailto:cedaw@ohchr.org)

IOK/53/2022

3 September 2022

**ANNEX**

**Compilation of recommendations from the Finnish Human Rights Centre / NHRI for the 83rd session, consideration of the state report of Finland**

# General observations on national action plans and policy programs

* Improve coordinated thematic work across administrative sectors and ensure continuation of actions over the four-year election periods.

# Reply to paragraph 2 – Visibility of the Convention, it’s optional protocol and the Committee’s general recommendations

* Improve the knowledge and availability of the Convention, the general comments and specific recommendations by the CEDAW-Committee in national languages and minority languages.

# Reply to paragraph 3 – Women’s rights and gender equality in relation to the pandemic and recovery efforts

* Include gender impact assessment in all decision making, especially during a crisis, affecting women to a greater degree, and in any related restrictions and recovery measures.

# Reply to paragraph 6 – Access to justice and legal complaints mechanism

* Include cases of discrimination in employment to the mandates of the Non-Discrimination Ombudsman and the Non-Discrimination and Equality Tribunal on the basis of the Non-Discrimination Act.
* Allow the Non-Discrimination and Equality Tribunal to impose compensation and strengthen the Tribunal’s role as an independent and impartial, low cost and low threshold judicial body.
* Strengthen the existing institutions and allocate enough resources to enable them to better oversee and advance the realisation of equality and non-discrimination legislation, including tackling multiple, and especially intersectional discrimination.

# Reply to paragraph 11 – Discriminatory gender stereotypes and harmful practises

* Reform the Trans Act to enable also persons under the age of 18 to legally change their gender under certain requirements.
* Introduce a legal ban on medically unnecessary procedures on intersex children without their free and informed prior consent.
* Guarantee equal access to treatment for intersex people by preparing national guidelines for medical professionals.
* Ensure that the provisions relating to FGM are clarified, preferably by a separate provision in the Criminal Code.

# Reply to paragraph 13 – Gender-based violence against women

* Ensure that a sufficient amount, also accessible, shelters and victim services are available throughout the country and that they are easily identified by victims.
* Organise a general awareness campaign on gender-based violence and in specific on the changes in legislation concerning lack of consent as part of definition of rape.

# Reply to paragraph 15 – Trafficking and exploitation of prostitution

* Ensure that the authorities recognise victims of trafficking in order to prevent deportation of the said victims.
* Amend the requirements for residence permits to safeguard the victims’ rights.
* Proceed without unnecessary delay to improve legislation on forced marriages.

# Reply to paragraph 21 – Employment

* Improve the participation of women from disadvantaged groups in the labour market by information campaigns, financial incentives and other temporary measures aimed at employers.
* Consider creating an obligation to larger employers to hire a minimum number of persons with disabilities or persons with lowered ability to work or alternatively in other ways contribute financially to the employment of said persons.

# Reply to paragraph 22 – Health

* Amend the Sterilisation Act to ban sterilisation of disabled persons without their consent.
* Make free or inexpensive contraceptives and period products available for young persons equally in all municipalities.

# Reply to paragraph 23 – Disadvantaged groups of women

* Provide sufficient financial resources and take concrete measures to implement national policies and action plans regarding disadvantaged groups of women.
* Enhance data collection of intersecting forms of discrimination towards disadvantaged groups of women, especially Sámi women, women with disabilities and older women.

# Reply to paragraph 24 – Climate change and disaster risk reduction

* Ensure that all climate policies and law reforms related to climate include a gender impact assessment and that the results are reflected in practical climate measures.

\*\*\*