



OHCHR
Committee on the Rights of Persons with Disabilities
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Opening Statement for the Public Dialogue on Finland's Initial Report to the CRPD Committee

This document contains observations by the Finnish Human Rights Centre (HRC¹, NHRI) to the Committee on the Rights of Persons with Disabilities / 33rd session (11 to 29 August 2025).

Should you have any further questions or need for additional information, do not hesitate to contact us at info@ihmisoikeuskeskus.fi.

¹ The Human Rights Centre represents the Finnish National Human Rights Institution (NHRI) in international NHRI cooperation and other international and European cooperation in human rights.

The NHRI comprises the Human Rights Centre, its pluralistic 39-member Human Rights Delegation, and the Office of the Parliamentary Ombudsman. The institution complies with the UN Paris Principles and the Global Alliance of NHRIs (GANHRI) accredited it with A-status in 2014, 2019 and 2025.

Decision-making Processes and Civil Society Involvement

- There is a need to emphasise the right of persons with disabilities to participate meaningfully in decision-making processes that affect their lives. Despite the obligation set forth in Article 4.3. of the CRPD, this right is increasingly being neglected under the current government.
- Legislative reforms, including the Disability Services Act and other social security legislation, have proceeded without adequate consultation or impact assessments.
- In some instances, the government has disregarded the foreseeable negative consequences for persons with disabilities.
- Moreover, significant funding cuts to disability organisations have severely limited their ability to carry out advocacy work, fight for access to and participate in decision-making processes.

General Social security Cuts

- Persons with disabilities are affected both by the general cuts to the social security legislation and by the specific changes introduced to the provisions and implementation of the Disability Services Act. These changes are cumulative in their harm, and their full impact remains unclear due to the absence of proper impact assessments.
- Moreover, austerity measures have reduced the already limited opportunities of persons with disabilities to increase their earned income. No compensatory measures have been introduced to promote their inclusion.

Employment

- There is an urgent need for a national employment strategy tailored to persons with disabilities, as well as a need to carry out research into the barriers to employment faced by persons with disabilities to identify effective solutions.
- At present, the government lacks systematic policy measures to promote the participation of persons with disabilities in working life. Furthermore, it has not implemented any targeted and concrete policy measures to promote the right to work for persons with disabilities.
- Recent legislative changes have worsened the situation: wage-subsidized work, a key entry point into employment, no longer counts toward earnings-related unemployment benefit eligibility. Additionally, the removal of the protected portion of unemployment benefits makes it harder for persons with disabilities to accept part-time work and gain work experience.

Disability Services Act

- The Disability Services Act has undergone two revisions during the current government's term, primarily for cost-saving purposes.
- Presently there is an ongoing effort to narrow the scope of disability services so that as few persons with disabilities as possible would fall under its protection. The government argues that the primary legislation, such as the

Social Welfare Act and Act on Support for Informal Care, is sufficient for others.

- The Finnish NHRI strongly disagrees. The services provided under the primary legislation do not guarantee the rights to independent living or equal participation in society – rights the Disability Services Act was specifically designed to uphold.

Risks of Re-institutionalisation

- The Finnish NHRI wants to inform the Committee that the official statistics fail to capture the true extent of institutional living. Many large residential units operate with institutional practices but are not classified as such.
- Housing solutions for people with intellectual disabilities remain system-centred, with group homes often being the only option offered, even when individuals could and would prefer to live in ordinary apartments.
- Despite the need for smaller, community-based housing, large residential units continue to be built. Compounding this issue, the government has drastically reduced investment grants for housing for people with intellectual disabilities, from €100–120 million annually to just €15 million in 2025.

Accessibility Issues

- Accessibility legislation in Finland remains incomplete. The government chose not to adopt the annex of the EU Accessibility Act related to the built environment. As a result, current laws apply only to new construction and major renovations.
- There is no legal obligation to improve accessibility in public built environment.
- Furthermore, the Deputy-Ombudsman has emphasised that while digital services must meet accessibility standards, authorities must also ensure that alternative, non-digital options remain available.

Implementation of S.K. v. Finland (CRPD/C/26/D/46/2018)

- The implementation of the Committee's decision in the case of *S.K. v. Finland* has been inadequate.
- The State party failed to take the initiative to reconsider the applicant's request for personal assistance, as the Committee required.
- Although a new support service was introduced to the Disability Services Act, it is not as comprehensive as personal assistance, and restrictive eligibility criteria continue to remain in the law.
- The individual's situation remains unresolved – and no systemic changes have been made to prevent similar violations.

Independent Monitoring Mechanism

- The task of the independent monitoring mechanism under Article 33.2 of the CRPD is assigned to the Finnish National Human Rights Institution, comprised of the Human Rights Centre, its Human Rights Delegation and the Parliamentary Ombudsman.

- The mandate of the independent monitoring mechanism does not include protection of the rights of persons with disabilities in the private sector, only public sector.
- The Finnish NHRI requests the view of the Committee on this matter.