

Convention on the Rights of Persons with Disabilities

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Committee on the Rights of Persons with Disabilities

Concluding observations on the initial report of Finland*

I. Introduction

1. The Committee considered the initial report of Finland at its 804th and 805th meetings, held on 21 and 22 August 2025. It adopted the present concluding observations at its 809th meeting, held on 26 August 2025.
2. The Committee welcomes the initial report of Finland, which was prepared in accordance with the Committee's reporting guidelines and the additional information submitted by the State party, as well as the replies to the list of issues in relation to its initial report.
3. The Committee appreciates the constructive dialogue held with the State Party's delegation, which included representatives of the relevant government ministries. The Committee also expresses its appreciation for the active participation of the Finnish Human Rights Centre in representation of the Finnish National Human Rights Institution (NHRI), and in its capacity as the national human rights institution and independent monitoring mechanism pursuant to article 33 (2) of the Convention.
4. The Committee regrets that it did not receive sufficient information about the implementation of the Convention for Sámi persons with disabilities. The current document is unable to sufficiently reflect the situation for Sámi persons with disabilities within their homeland and other territory of the State Party.

II. Positive aspects

5. The Committee welcomes the measures taken by the State party to promote the rights of persons with disabilities and to implement the Convention since accession in 2016, including the following:
 - (a) The establishment of the Truth and Reconciliation Process for the Deaf and Sign Language Users, in 2025;
 - (b) The Third National Plan on the Convention on the Rights of Persons with Disabilities (2023–2027), in 2023;
 - (c) The Disability Policy Action Plan of Åland (2022–2025), in 2022;
 - (d) The development of human rights indicators to strengthen transparent and evidence-based monitoring, in 2021.

* Adopted by the Committee at its thirty-third session (11-26 August 2025).

III. Principal areas of concern and recommendations

A. General principles and obligations (arts. 1–4)

6. The Committee notes with concern:

(a) Significant disparities in the implementation of the Convention across central, regional and local levels and on the Åland Islands;

(b) The long delay in passing legislation on the right to self-determination of persons with disabilities;

(c) Budget cuts to social and health services since the fall of 2023 and in the current 2026 budget proposal, disproportionately affecting persons with disabilities and their representative organizations, and the discontinuation of national pensions and allowances to persons living outside the State Party's territory, gravely affecting persons with disabilities from the Åland Islands residing in Sweden;

(d) The lack of a cohesive and legally entrenched mechanism for the close consultation and active involvement of persons with disabilities, through their representative organizations.

7. The Committee recommends that the State party, in close consultation and the active involvement of persons with disabilities, through their representative organizations:

(a) **Coordinate the central, regional and local levels of government and the Åland Islands to ensure consistent compliance with the Convention across its territory;**

(b) **Expediently proceed with the reform of legislation on the right to self-determination and ensure that is fully aligned with the Convention;**

(c) **Ensure that no retrogressive measures are taken, offset retrogressive measures already taken, provide sufficient funding to organizations of persons with disabilities to fully participate in the implementation of the Convention, and ensure that persons with disabilities in the Åland Islands residing in Sweden receive the requisite financial assistance, either by providing it itself or by duly coordinating the responsibilities with the Swedish authorities;**

(d) **Develop legally entrenched processes of close consultation and active involvement of persons with disabilities, through their representative organizations, including in social welfare counties, in all matters relating to the implementation of the Convention.**

B. Specific rights (arts. 5–30)

Equality and non-discrimination (art. 5)

8. The Committee notes with concern that:

(a) The 2023 amendments to the Non-Discrimination Act do ensure accessibility in practice, do not provide for remedies that de facto render goods and services accessible, and may weaken the position of children with disabilities in education by removing the obligation to draw up site-specific equality plans in early childhood education and care;

(b) The recommendations from the National Non-Discrimination and Equality Tribunal on compensation to victims of discrimination are not legally binding;

(c) Proposed amendments to Section 2 of the Discrimination Services Act may exclude many persons with disabilities from services that are required under the Convention.

(d) The Government's proposal of 2025 to amend the Disability Services Act that is currently under preparation and has not yet been submitted to parliament, seeking to distinguish between requirements for assistance and support "normally associated with the

stage of life in question” would, in its current form, discriminate on the basis of age, and would be-incompatible with article 1 of the Convention;

- (e) The lack of a comprehensive strategy for the promotion and use of Easy Read;
- (f) The lack of information on the invocation of the Convention by Finnish courts and information received that direct references to it are rare and usually of pro forma nature;
- (g) The findings of a scientific study showing that persons with disabilities experience continued discrimination.

9. The Committee recommends the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:

(a) Taking into consideration the insufficient accessibility requirements in the Building Code, broaden the scope of the Non-Discrimination Act to include discrimination in access to goods and services, ensure that redress for victims of discrimination includes de facto access to goods and services, and consider re-introducing the obligation to draw up site-specific equality plans in early childhood education and care;

(b) Consider conferring jurisdiction to the National Non-Discrimination and Equality Tribunal to render binding decisions on compensation for victims of discrimination under the Non-Discrimination Act;

(c) Ensure that Section 2 of the Disability Services Act guarantees access to all disability entitlements of the Convention;

(d) Refrain from introducing the “life stages” criteria in the Disability Services Act;

(e) Develop a nationwide programme to promote and use Easy Read and ensure its implementation in the public and private sector;

(f) Analyse the use of the Convention in the judicial application of domestic legislation and ensure that courts give the Convention the full effect permitted under domestic law;

(g) Update the 2019 fundamental rights barometer of the Ministry of Justice to provide reliable information on the exercise of the rights of persons with disabilities under the Convention.

Women with disabilities (art. 6)

10. The Committee is concerned that the Government Equality Program 2024-2027 and other gender policies, including those on gender-based violence:

(a) Do not mainstream disability, lack an intersectional approach, nor they address the requirements of Roma, Sámi and immigrant women and girls with disabilities only in passing;

(b) Do not contain effective mechanisms for their implementation, monitoring and accountability.

11. The Committee recommends the State party:

(a) Mainstream disability and follow an intersectional approach in all legislation and policies on gender equality, gender-based violence and disability, and ensure that they encompass intersectional forms of discrimination faced by Roma, Sámi and immigrant women and girls with disabilities;

(b) Develop mechanisms for the implementation, monitoring and accountability of policies on women with disabilities;

Children with disabilities (art. 7)

12. The Committee is concerned that:

(a) The Open Government Action Plan 2023-2027 includes children with disabilities only implicitly;

(b) Services and support for children with disabilities do not always allow them to live with their families in their communities;

(c) Children with disabilities face barriers in accessing health care services, including mental health services;

(d) Children with disabilities may face challenges in obtaining support to freely express their requirements and views on all matters affecting them, and for those requirements and views to be given due weight in accordance with a child's age and maturity.

13. The Committee recommends that the State party, in close consultation and the active involvement of persons with disabilities, through their representative organizations:

(a) **Mainstream the rights of children with disabilities into all its laws, public policies, action plans and strategies, including in the Open Government Action Plan 2023-2027;**

(b) **Provide adequate and appropriate services and support for children with disabilities, including children with psychosocial and/or intellectual disabilities, to live with their families in their communities, and ensure that deaf children with disabilities who have cochlear implants can in fact learn sign language and participate in deaf culture, and provide the adequate support mechanisms to this end;**

(c) **Guarantee access of children with disabilities to health care services, including mental health services, and raise awareness among health care personnel on the rights and requirements of children with disabilities;**

(d) **Improve accessible mechanisms for consultation of children with disabilities in all matters affecting them, and provide accessible, age-appropriate information and support to children with disabilities to participate in these mechanisms.**

Awareness-raising (art. 8)

14. The Committee is concerned about findings of the Non-Discrimination Ombudsman that "one key factor behind the problems faced by people with disabilities is negative attitudes and a lack of knowledge", and the lack of specific awareness-raising measures on the rights of persons with disabilities in educational settings in the public and private sector.

15. The Committee recommends that the State party, in close consultation and the active involvement of persons with disabilities, through their representative organizations, design and implement a long-term, comprehensive awareness-raising program on the rights of persons with disabilities, covering all State entities and all parts of society, including educational settings in the public and private sector, with clear goals and monitoring mechanisms.

Accessibility (art. 9)

16. The Committee is concerned that:

(a) Section 35 of the Building Act (751/2023) on Accessibility is not applicable to outdoor areas that are not adjacent to buildings; the rules on accessibility in the Government Decree on the Accessibility of Buildings of 2017 apply only to new buildings and to renovations and alterations of existing buildings requiring a building permit; the decree does not contain requirements for tactile, visual, auditive, language and other sensory measures; and that the State Party has not opted in to Annex 3 of the European Accessibility Act "Accessibility requirements for the purpose of article 4(4) concerning the built environment";

(b) The State Party lacks a strategy to remedy the deficiencies in the accessibility of public transport as revealed in the Report on Accessibility of Public Transport Travel Chains of the Ministry of Transport and Communications of 2022;

(c) Persons with intellectual disabilities face barriers in accessing essential online services, that public information provided by government, particularly municipalities, rarely uses Easy Read, and that universal design is seldom applied by public and private actors.

17. The Committee recommends the State party in close consultation and the active involvement of persons with disabilities, through their representative organizations:

(a) Enact legislation on accessibility of all built environment, extend accessibility requirements to existing buildings not subject to renovations or alterations, and develop and explicitly require tactile, visual, auditive, language and other sensory accessibility measures and opt in to Annex 3 of the European Accessibility Act “Accessibility requirements for the purpose of article 4(4) concerning the built environment”;

(b) Develop a comprehensive plan on accessible public transport with targets, time frames and budget allocations, and ensure that it incorporates the findings of the Report on Accessibility of Public Transport Travel Chains of the Ministry of Transport and Communications;

(c) Guarantee easy access of persons with intellectual disabilities to strong online identification tools and ensure that public and private actors regularly provide information to the public in Easy Read and apply universal design principles in the development of online tools.

Right to life (art. 10)

18. 17. The Committee is concerned about:

(a) The restrictions on the right to care and intensive care for children with disabilities;

(b) The practice to advise families of children with disabilities to limit resuscitation, treatment in intensive care or life-supporting treatment for them;

(c) The authority of doctors, in some circumstances, to limit treatment without the patient’s consent, creating the risk of disproportionately limiting treatment for persons with disabilities.

19. The Committee recommends the State party, in close consultation and the active involvement of persons with disabilities, through their representative organizations:

(a) Ensure that all persons with disabilities, including children with disabilities, have access to care and intensive care on an equal basis with others, without any restriction based on disability;

(b) Ensure that advice on resuscitation, treatment in intensive care or life supporting treatment to families of children with disabilities is provided on an equal basis with others, not proposing any limitations of such treatment based on disability;

(c) Eliminate all forms of substitute decision making on medical interventions and guarantee personal and free informed consent of persons with disabilities for all medical treatment.

Situations of risk and humanitarian emergencies (art. 11)

20. The Committee notes with concern:

(a) The lack of mandatory requirements and monitoring mechanisms for disability inclusion in humanitarian action, civil protection, disaster risk reduction and climate change, including in the Åland Islands;

(b) The insufficient mechanisms for organizations of persons with disabilities, including those on the Åland Islands and for Sámi persons with disabilities to be closely

consulted and actively involved in the design and implementation of policies concerning humanitarian action, civil protection, disaster risk reduction and climate change;

(c) The inaccessible emergency and early warning systems, including the cessation of the trial sign language emergency calls via video link program and the postponement of real-time text (RTT) for emergency calls until 2027.

21. Recalling the Sendai Framework for Disaster Risk Reduction 2015 – 2030, the Inter-Agency Standing Committee Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action and the Committee’s Guidelines on deinstitutionalization, including in emergencies, the Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities, through their representative organisations:

(a) Ensure that the legislative, policy and implementation frameworks on humanitarian action, disaster risk reduction, civil protection and climate change are inclusive of measures for the protection and safety of persons with disabilities, establish reporting, capacity building and monitoring mechanisms and, incorporate disability inclusion indicators based on the principles and standards of the Convention;

(b) Establish formal engagement mechanisms for persons with disabilities through their representative organizations, including those on the Åland Islands and for Sámi persons with disabilities, to facilitate the design, implementation and monitoring of policies concerning humanitarian action, civil protection, disaster risk reduction and climate change;

(c) Establish and implement accessible emergency and early warning systems, including by expediting implementation of relevant EU Directives and development of new emergency and early warning practices to ensure accessibility for all persons with disabilities.

Equal recognition before the law (art. 12)

22. The Committee notes with concern:

(a) The large numbers of persons with disabilities under guardianship, and that, despite the reforms to the Guardianship Services Act (442/1999), there are insufficient legal and policy measures to replace substitute decision-making with supported decision-making;

(b) The limited scope and lack of clarity in the application of the supported decision-making service under the Disability Services Act and the use of guidelines by the welfare services counties that can limit access to this service;

(c) Insufficient measures to mitigate the risk arising from ratification of the 2000 Hague Convention on the International Protection of Adults (2000 Hague Convention) in promoting substitute decision-making measures and institutionalisation.

23. Recalling its general comment No. 1 (2014) on equal recognition before the law, the Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities through their representative organisations:

(a) Revise legislation to eliminate all forms of substitute decision-making regimes and establish a legislative and policy framework for the implementation of supported decision-making;

(b) Review and monitor the supported decision-making service to ensure it meets the standards and principles of the Convention, clearly define its application and extend its scope beyond the Disability Services Act, and ensure that access is not restricted through the guidelines of welfare services counties;

(c) Monitor and assess the impact of the implementation of the 2000 Hague Convention on persons with disabilities and their right to self-determination to determine there is no regression from the CRPD.

Access to justice (art. 13)

24. The Committee notes with concern:

(a) The insufficient provision of procedural and age-appropriate accommodations in all judicial and administrative proceedings and the lack of adequate training for judicial and administrative personnel on procedural accommodation and access to justice for persons with disabilities;

(b) The delays in administrative court processes that prevent provision of essential support to children and adults with disabilities for lengthy periods of time and administrative court decisions that return matters to the county that effectively requires repetition of the same process, without reasonable prospect of success;

(c) The insufficient measures to respond to the needs of victims and suspected offenders with disabilities;

(d) The lack of resources, including funding for organisations of persons with disabilities to provide legal advice and advocacy and to participate in the design and delivery of training to judicial personnel.

25. Recalling the International Principles and Guidelines on Access to Justice for Persons with Disabilities, the Committee recommends that the State party, in close consultation and active involvement of persons with disabilities through their representative organizations:

(a) Implement a comprehensive, mandatory strategy to ensure the provision of procedural and age-appropriate accommodation for persons with disabilities free of charge in all adjudicative civil, criminal and administrative proceedings, including access to certified sign language interpreters, so that persons with disabilities can participate effectively;

(b) Ensure appropriate and mandatory training for all judicial and administrative personnel, including members of the judiciary, administrators, prosecutors, law enforcement, public defenders and prison personnel on the provision of procedural accommodation and access to justice for persons with disabilities, without reasonable prospect of success;

(c) Amend administrative court processes to eliminate delays in the provision of essential support to persons with disabilities, and to ensure that court decisions provide an effective remedy and do not result in repetition of the administrative process;

(d) Take measures to fulfil the rights of victims with disabilities and persons with disabilities suspected or accused of an offence in line with the Convention and obligations under EU law, including the Anti-Trafficking Directive 2024/1712 and Directive 2024/1385 on combating violence against women and domestic violence, and the EU Victims' Rights Strategy 2020-2025;

(e) Adequately resource and fund organisations of persons with disabilities to provide legal advice and advocacy to persons with disabilities and to participate in the design and delivery of training to judicial and administrative personnel.

Liberty and security of the person (art. 14)

26. The Committee notes with concern:

(a) The lack of measures to repeal laws and legal provisions that involuntarily detain persons with disabilities on the basis of impairment;

(b) The lack of clarity on the position of the State Party in relation to its future participation in any process towards the adoption of an additional protocol to or recommendation concerning the Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine.

27. **Recalling its general comment No. 1(2014), its guidelines on the right to liberty and security of persons with disabilities, and its guidelines on deinstitutionalization, including in emergencies, the Committee recommends that the State party, in close**

consultation and active involvement of persons with disabilities through their representative organisations:

(a) **Ensure that disability is not a reason to deprive a person's liberty under any law, including the Mental Health Act (116/1990) and the Act on Special Care for People with Intellectual Disabilities, and end all practices that allow for deprivation of liberty on the basis of impairment;**

(b) **In recognition of the Committee's joint open letter with the Special Rapporteur on the rights of persons with disabilities to the Council of Europe, dated June 2021, as well as the January 2025 open letter to the Secretary-General of the Council of Europe, the Committee of Ministers of the Council of Europe, the Committee on Bioethics of the Council of Europe, the Steering Committee for Human Rights, the Commissioner of Human Rights, the Parliamentary Assembly of the Council of Europe and other organizations and entities of the Council of Europe, promote the move away from coercive measures and the development of a non-coercive framework on mental health, as required under the Convention in future participation in any process towards the adoption of an additional protocol to or recommendation concerning the Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine;**

Freedom from torture or cruel, inhuman or degrading treatment or punishment (art. 15)

28. The Committee notes with concern:

(a) The prevalence and use of coercion, forced treatment and restrictive measures against children and adults with disabilities in psychiatric institutions, residential institutions, aged care facilities, prisons, early childhood and primary education;

(b) That oversight, monitoring and reporting of harmful practices, such as forced treatment, restrictive practices and impairment-based detention are not sufficiently accessible for persons with disabilities, do not provide sufficient legal remedies, and are often not well known to persons with disabilities.

29. **Recalling its guidelines on deinstitutionalization, including in emergencies, the Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities through their representative organizations, take all legislative, administrative and judicial measures necessary to:**

(a) **Prohibit the use of coercion, forced treatment and restrictive practices against children and adults with disabilities in psychiatric institutions, residential institutions, aged care facilities, prisons, early childhood and primary education; and establish alternative non-coercive, age-appropriate support measures that respect the will, preference, dignity and rights of persons with disabilities, and provide training to all medical and non-medical staff on these measures;**

(b) **Strengthen the oversight, monitoring and reporting of the National Preventive Mechanism to identify and address harmful practices, such as forced treatment, restrictive practices and impairment-based detention that are lawful or regulated through domestic law, but which do not meet the standards and principles of the Convention.**

Freedom from exploitation, violence and abuse (art. 16)

30. The Committee notes with concern:

(a) The prevalence of exploitation, violence and abuse against persons with disabilities in institutions, the community and the family home, in particular against women with disabilities and children with disabilities;

(b) Insufficient actions to address violence experienced by women and girls with disabilities within plans to address gender-based violence;

(c) The inaccessibility and negative attitudes within victim support services and shelters, including the lack of knowledge concerning responding to the specific and unique forms of exploitation, violence and abuse experienced by persons with disabilities.

31. Recalling General Comment No. 3 on women and girls with disabilities, the Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities, including women and girls with disabilities, through their representative organisations:

(a) **Develop and implement comprehensive violence prevention and response strategies across the State Party, including culture-, gender-, age-, disability specific measures, access to justice measures and the establishment of accessible culture-, gender, age-appropriate and disability inclusive support and rehabilitation and covering institutions, the community and the family home.**

(b) **Transpose the EU Directive on Combating Violence against Women into national law and policy, and substantially strengthen the intersectional components and specific measures taken to address the situation of women and girls with disabilities in implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence;**

(c) **Ensure that all its strategies and programmes on violence prevention are disability inclusive, ensure the accessibility of all victim support services and shelters, carry out capacity building to recognise and respond to the specific forms of exploitation, violence and abuse experienced by persons with disabilities, including women and girls with disabilities.**

Protecting the integrity of the person (art. 17)

32. The Committee notes with concern:

(a) That the State Party retains section 2 of Act No. 283/1970 on Sterilisation, as well as laws and policies that allow for abortion and contraception without the free and informed personal consent of women and girls with disabilities;

(b) That despite Finland's leadership role in the adoption of the Human Rights Council resolution, "Combating Discrimination, Violence, and Harmful Practices against Intersex Persons", there are insufficient measures to protect intersex children from unnecessary and deferable medical interventions.

33. The Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities, including women and girls with disabilities and intersex persons through their representative organisations:

(a) **Repeal section 2 of Act No. 283/1970 on Sterilisation, and take all legislative, policy and administrative measures to prohibit sterilisation, abortion and contraception without the free and informed personal consent of persons with disabilities and to provide effective remedies for victims of forced sterilisation, abortion and contraception;**

(b) **Adopt and implement a legislative and policy framework to explicitly prohibit the performance of medically unnecessary and deferable interventions, including surgical, hormonal or other medical procedures on intersex minors, and provide criminal, civil and administrative remedies, healthcare and psychosocial support for intersex persons who have been subjected to intersex genital mutilation.**

Liberty of movement and nationality (art. 18)

34. The Committee notes with concern the State Party's plans to restrict health care access for irregular or undocumented migrants, including those with disabilities, to urgent healthcare, limiting access to assistive devices, rehabilitation and disability-related support.

35. The Committee recommends that the State Party withdraw and reconsider proposals before Parliament to restrict health care access for irregular or undocumented migrants with disabilities to urgent health care, and ensure access to

non-urgent health care, including assistive devices, rehabilitation and disability-related support.

Living independently and being included in the community (art. 19)

36. The Committee notes with concern:

(a) Insufficient measures to prevent institutionalisation of persons with disabilities, including children and older persons with disabilities, due to inaccessible housing in the community, restrictions on personal assistance, inequity across welfare services counties and between the Disability Services Act and the Social Welfare Act;

(b) The lack of Swedish language social services and accessible housing options for people with disabilities from the Åland islands resulting in relocation to services in Sweden and unclear jurisdictional responsibilities for financing, care, social insurance and oversight and monitoring.

37. Recalling its general comment No. 5 (2017) on living independently and being included in the community, its guidelines on deinstitutionalization, including in emergencies, the report of the Special Rapporteur on the rights of persons with disabilities on the transformation of services for persons with disabilities, the Committee recommends that the State Party, in close consultation and active involvement of persons with disabilities through their representative organisations:

(a) Implement a coordinated deinstitutionalisation strategy across all its territories, with timelines and financial resources, and applicable across all institutional settings, such as nursing homes, group homes, residential facilities and psychiatric institutions;

(b) Develop a nationally consistent, rights-based legislative and policy framework for the provision of community-based supports and services, including accessible housing, home support and personal assistance that respects self-direction and individual control and does not impose age limitations, service fees or waitlists, and ensures equity across welfare services counties and between the Disability Services Act and the Social Welfare Act;

(c) Urgently invest in Swedish language social services and accessible housing options to foster the cultural and linguistic identity of Åland persons with disabilities, to end the need to seek services in mainland Finland or to be relocated to services in Sweden, and resolve the jurisdictional responsibilities for financing, care, social insurance, oversight and monitoring.

Personal Mobility (art. 20)

38. The Committee is concerned at:

(a) The insufficient availability of accessible public transport and the discretionary criteria from Social Welfare Counties for granting access to transport services;

(b) Restrictive amendments to criteria for accessing technical aids, and cutbacks on tax exemptions for the acquisition of vehicles and assistive technologies;

39. The Committee recommends that the State party:

(a) Ensure availability of accessible public transport and private and/or shared complementary transport options throughout the territory, and establish harmonized guidelines across all Social Welfare Counties to ensure transparency and equity in access to mobility services for all persons with disabilities;

(b) Ensure that budget cuts do not infringe on the autonomy of persons with disabilities, guarantee the provision of technical aids, including vehicles and assistive technologies, at affordable cost, and eliminate bureaucratic barriers in access to technical aids.

Freedom of Expression and Opinion and Access to Information (art. 21)

40. The Committee is concerned at persistent barriers to access to information for persons with disabilities, particularly deaf persons, deaf-blind persons, persons with intellectual and/or psychosocial disabilities and Sámi persons with disabilities whose mother tongue is Finland Swedish, at the limited scope of public information service programming and at the low availability of Finland Swedish sign language interpreters.

41. **The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations ensure the implementation of the European Union Web Accessibility Directive (2016) and guarantee that official information and websites are accessible, including in audio description, Easy Read, and in Finnish and Finland Swedish sign language and that qualified sign language interpreters in Finnish and Finland Swedish are available, including in the Åland Islands, develop a plan for the implementation of recommendations from the Council for the Study of Sign Language and expand the programming of public information services.**

Respect for Privacy (art. 22)

42. The Committee is concerned at:

(a) The lack of awareness of mechanisms to protect the privacy of persons with disabilities in institutions, including the lack of awareness of complaint and accountability mechanisms;

(b) The potential invasive nature of procedures to evaluate personal assistance requirements and other in-home supports.

43. **42. The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:**

(a) **Considering that access to justice is key to deinstitutionalization, develop awareness of procedures for persons with disabilities in institutions to lodge complaints in cases of violation of their rights, including their right to privacy, for the investigation of such violations and to ensure accountability;**

(b) **Ensure that evaluation procedures for personal assistance and other in-home supports respect the right to privacy and carry out capacity building for public officers on the matter.**

Respect for Home and the Family (Art. 23)

44. The Committee is concerned that:

(a) Information on family planning, artificial fertilization procedures, or adoption is not accessible and not available in sign language, including Finland Swedish sign language;

(b) General and specialized family services lack sufficient training to provide support to persons with disabilities, whether parents or children.

45. **The Committee recommends that the State party:**

(a) **Ensure that all policies and information on family planning, including artificial fertilization procedures and adoption procedures, are accessible for persons with disabilities and available in sign language, including Finland Swedish sign language;**

(b) **Increase awareness and capacity building on the rights of persons with disabilities for officers providing general and family services and ensure adequately funded community-based services for children with disabilities and their families to prevent out-of-home placement and to support parents with disabilities in caring for their children.**

Education (art. 24)

46. The Committee is concerned at:

- (a) The lack of implementation of inclusive education, leading to the prevalence of segregated education;
- (b) The lack of qualified teachers to provide inclusive education;
- (c) The inaccessibility of the education system on the Åland Islands as well as the lack of retention, and limited educational development of students with disabilities;
- (d) The denial of enrolment to students with disabilities in higher education based on safety criteria and by the inaccessibility of university student information systems and websites.

47. **The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:**

(a) **Transform the education system into an inclusive education system, by, inter alia, implementing capacity building programs on the right to inclusive education of persons with disabilities, converting segregated education centers into support centers for inclusive education, reorienting the resources to support mainstream educational centers, ensuring the provision of reasonable accommodation for students with disabilities, including individualized learning plans, and guaranteeing educational performance evaluations without discrimination;**

(b) **Improve training in educational settings on the rights of persons with disabilities and inclusive education, expand the number of qualified teachers, increase the recruitment of teachers with disabilities and ensure they are provided with reasonable accommodation, including in the Åland Islands;**

(c) **Ensure that the regulatory review of the Åland Islands education system is in line with the Convention, and allocate sufficient resources to ensure all students with disabilities can access, remain, and pursue their education on an equal basis with others;**

(d) **Review admissions procedures in higher education to ensure access for students with disabilities and that they can pursue their professional training on an equal basis with other students, eliminate requirements restricting or limiting their academic training based on the student's disability, and ensure that student information systems and university websites are accessible, including for blind students and students with visual impairments.**

Health (art. 25)

48. The Committee is concerned that:

- (a) Inequity in health services for persons with disabilities across Social Welfare Counties and the lack of disability inclusion and accessibility in the digitization of health services;
- (b) The increase in the price of specific medication and treatments disproportionately restricts access to health for persons with disabilities, particularly persons with disabilities with lower incomes.

49. **The Committee recommends that the State party:**

(a) **Ensure that Social Welfare Counties abide by guidelines on the right to health of persons with disabilities that are consistent throughout the State party, that health services are not contingent upon the place of residency, that telemedicine and remote care services are available in Finnish and Finland Swedish sign language, that online portals are accessible to screen readers and incorporate Easy-Read options, and expand the training of healthcare professionals on the rights of persons with disabilities;**

(b) Adjust the pricing of medication and treatments to ensure that all persons with disabilities, including persons with disabilities with lower incomes, can access them in a timely manner.

Habilitation and Rehabilitation (art. 26)

50. The Committee is concerned about:

- (a) The prevalence of a medical approach to rehabilitation;
- (b) The division of duties between different rehabilitation services among public entities and levels of government, restricting access for persons with disabilities to comprehensive habilitation and rehabilitation programmes.

51. The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:

- (a) Take a human right approach to its habilitation and rehabilitation programmes and ensure their availability nationwide, including in the Åland Islands, guarantee comprehensive, interdisciplinary and individualized evaluations for habilitation or rehabilitation plans and make information on habilitation and rehabilitation programmes available in accessible formats, including Finnish and Finland Swedish sign languages, Easy-Read, pictograms, Braille and in digital media;
- (b) Render procedures for habilitation and rehabilitation services accessible and establish monitoring and complaint mechanisms to guarantee effective enforcement.

Work and Employment (art. 27)

52. The Committee is concerned at:

- (a) Structural and entrenched prejudice and negative stereotypes about the capacity and productivity of persons with disabilities leading to barriers in access to employment;
- (b) The low participation as well as the insufficient data on employment of persons with disabilities in the open labour market;
- (c) The lack of affirmative measures to promote employment of persons with disabilities.

53. The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations address the low participation of persons with disabilities in the open labour market by:

- (a) Conducting awareness raising campaigns on the right to work of persons with disabilities, addressing stigma, discrimination and stereotypes about their labour skills; ensure accessibility of public and private employment online portals, adequate training of recruitment and human resources departments in the public and private sector, and ensure that training on occupational risk prevention is disability inclusive;
- (b) Collecting data and compiling statistics on access to employment of persons with disabilities, disaggregated by gender, age, indigeneity, geographical location, and type of impairment;
- (c) Actively promoting the employment of persons with disabilities and considering the implementation of affirmative action such as subsidy systems and incentives for employers, disseminating information on financial support for entrepreneurial initiatives of persons with disabilities, and ensuring the provision of support and reasonable accommodation in the workplace.

Adequate Standard of Living and Social Protection (art. 28)

54. The Committee is concerned that:

(a) Recent and ongoing reforms, including budget cuts and downsizing of the social security system, have disproportionately affected persons with disabilities, particularly persons with psychosocial disabilities, with lower incomes and with higher support requirements, and that such reforms have lacked comprehensive disability impact assessments;

(b) The limited funding of the Social Welfare Counties leads to restrictive practices in access to disability entitlements, endangering the rights under the Convention;

(c) The lack of measures to ensure access to social benefits for persons with disabilities relocated to Sweden.

55. **The Committee recommends that the State party:**

(a) **Conduct a comprehensive impact assessment of recent reforms, including budget cuts and cost saving measures, and ensure they do not have an adverse impact on the standard of living of persons with disabilities, and provide information on disability benefits in accessible formats;**

(b) **Ensure that the Social Welfare Counties receive a budget that allows for the provision of disability entitlements in accordance with the Convention;**

(c) **Take urgent measures to guarantee the access to social benefits for persons with disabilities relocated to Sweden.**

Participation in Political and Public Life (art. 29)

56. The Committee is concerned at:

(a) The low participation of persons with disabilities in elected positions and in political parties;

(b) Persistent accessibility barriers in voting centers, as well as deficiencies in guaranteeing the secrecy of voting;

(c) The limited allocation of resources on specific projects for organizations of persons with disabilities, including those stemming from Funding Centre for Social Welfare and Health Organizations;

(d) The lack of a strategy for the implementation of the new Åland Islands electoral legislation.

57. **The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:**

(a) **Develop educational programs on electoral rights and participation in public and political life of persons with disabilities, for their active participation in politics, to stand for elections, to participate in all decision-making bodies, and collect data on the participation of persons with disabilities in elections, as candidates and as voters;**

(b) **Ensure accessibility of all polling stations, establish mechanisms to guarantee the secrecy of ballots for all persons with disabilities and reconsider the introduction of a digital voting system accessible for persons with disabilities;**

(c) **Guarantee that organizations of persons with disabilities have sufficient funding and resources, including the Funding Centre for Social Welfare and Health Organizations, to carry out activities promoting the participation in political and public life of persons with disabilities;**

(d) **Implement the new Åland Islands electoral legislation.**

Participation in Cultural Life, Recreation, Leisure, and Sport (art. 30)

58. The Committee is concerned at:

- (a) The low participation of persons with disabilities in sports and cultural activities;
- (b) High costs of adapted sports equipment for persons with disabilities limiting or restricting their participation on an equal basis with others;
- (c) The lack of information on the impact of the new cultural policy strategy and the review of the Sports Act on the participation of persons with disabilities in cultural, recreational, leisure, and sports activities on the Åland Islands.

59. **The Committee recommends that the State party, in close consultation and active involvement of persons with disabilities, through their representative organizations:**

- (a) **Develop a national action plan to promote the participation of persons with disabilities in sports and cultural life, that includes measures to support athletes and artists with disabilities, and ensure accessible cultural and sports facilities;**
- (b) **Ensure that adapted sports equipment for persons with disabilities is affordable so that persons with disabilities can participate in cultural life, recreation, leisure, and sport on an equal basis with others;**
- (c) **Conduct a study on the impact of the new cultural policy strategy and the review of the Sports Act on the participation of persons with disabilities in cultural, recreational, leisure, and sports activities on the Åland Islands, to ensure its alignment with the Convention.**

C. Specific obligations (arts. 31–33)**Statistics and data collection (art. 31)**

60. The Committee notes with concern the serious shortcomings in the collection and publication of data on the exercise of the rights under the Convention.

61. **The Committee recommends that the State party develop comprehensive national disability data collections and statistics, including on the Åland Islands, to frame policies on the implementation of the Convention and monitor its compliance.**

International cooperation (art. 32)

62. The Committee is concerned about:

- (a) Significant reductions in the budget for the participation of organizations of persons with disabilities in international and development cooperation;
- (b) The withdrawal of the State party from the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction.

63. **The Committee recommends that the State party:**

- (a) **Ensure active involvement and close participation of persons with disabilities, through their representative organizations, in international cooperation and development, including by allotting sufficient financial means to this end;**
- (b) **Continue to abide by the provisions on victim assistance of the Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on their Destruction.**

National implementation and monitoring (art. 33)

64. The Committee notes with concern:

(a) That the Advisory Board for the Rights of Persons with Disabilities (VANE) has reduced some of its activities, including processes of the disabled people's councils of municipalities and welfare service counties, limiting participation of organizations of persons with disabilities in the development and implementation of the Convention;

(b) The reduction of funding for organizations of persons with disabilities, hampering their fundamental role of monitoring the implementation of the Convention;

(c) The State Party's remarks at the Constructive Dialogue that organizations of persons with disabilities could operate autonomously with private fundings.

65. **The Committee recommends that the State party:**

(a) **Ensure that persons with disabilities, through their representative organizations, are closely consulted and actively involved in the activities of the Advisory Board for the Rights of Persons with Disabilities (VANE) and other coordination mechanisms;**

(b) **Provide support to organizations of persons with disabilities to allow them to get involved and participate fully in the monitoring of the implementation of the Convention, by, inter alia, providing the requisite funding and rendering the processes and information accessible;**

(c) **Develop and implement a plan for the continued public and private funding of organizations of persons with disabilities and disability rights defenders that allows them to fulfil their role under the Convention autonomously.**

D. Follow-up**Dissemination of information**

66. The Committee emphasizes the importance of all the recommendations contained in the present concluding observations and it draws the State party's attention to the recommendations contained in paragraphs 7 (articles 1-4, general principles and obligations); 36 (article 19, living independently and being included in the community) and 46 (article 24, education) to take urgent measures.

67. The Committee recommends that the State party transmit the concluding observations for consideration and action to members of the Government and parliament, officials in relevant ministries, local authorities and members of relevant professional groups, such as education, medical and legal professionals, including on the Åland Islands, as well as to the media.

68. The Committee requests the State party to disseminate these concluding observations widely, including to non-governmental organizations and organizations of persons with disabilities, to persons with disabilities and members of their families, in national and minority languages, including sign language, and in accessible formats, including Easy Read, and to make them available on official websites.

69. The Committee strongly encourages the State party to involve civil society organizations, in particular organizations of persons with disabilities, in the preparation of its next periodic report.

Next periodic report

70. The combined second, third, fourth, and fifth reports are in principle due on 11 June 2034, under the simplified reporting procedure. The Committee will establish and communicate the exact due date of the combined periodic reports of the State party in line with a future clear and regularized schedule for reporting by States parties (see A/RES/79/165, para. 6) and following the adoption of a list of issues and questions prior

to reporting for the State party. The combined periodic reports should cover the entire period up to the time of its submission.
