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Committee on the Rights of Persons with Disabilities jorge.araya@un.org

Oral Statement for the Private Briefing 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.

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.

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.

Especially during the current governmental term, there have been several setbacks in the situation of the rights of persons with disabilities. I would like to highlight here some of them:

There have been significant cuts to the funding of organisations of persons with disabilities. As a result, it has become more difficult for them to monitor the implementation of the CRPD. Since we at the National Human Rights Institution rely on organisations of persons with disabilities in our own work on promoting rights of persons with disabilities, these cuts also affect our work.

There have also been considerable cuts to social security benefits. The government attempts to justify cuts to social security and services with arguments referencing increased economic productivity. However, for persons with disabilities, the cuts and the narrowing of terms of benefits target especially services and social security benefits that would enable them to participate as productive members of society. The government's actions further weaken their already limited employment opportunities. Moreover, the government has not introduced any measures to promote the inclusion and labour market participation of persons with disabilities.

The Disability Services Act has been revised twice during this government term, primarily for cost-saving reasons. There is an ongoing effort to narrow the scope of the legislation on disability services so that as few persons with disabilities as possible would fall under its protection. There is no other legislation in Finland that would guarantee equal participation and independent living.

All these changes to social security and services are negative, cumulative, and some of their impacts are yet to fully emerge, because no adequate impact assessment was carried out for the legislation.

The legislation of accessibility in the built environment is incomplete. The government opted not to adopt the annex of the EU Accessibility Act pertaining to the built environment at the national level. Accordingly, the current national accessibility legislation on built environment primarily applies only to new construction and major renovation work. There isn't a general obligation in Finnish national legislation to promote accessibility.

The Deputy-Ombudsman has particularly emphasized the accessibility and availability of public administration's e-services and the maintained possibility to participate in society regardless of whether a person has access to digital services. Even if authorities' e-services meet accessibility requirements, it does not relieve them from providing the appropriate services laid down in alternative ways.

The implementation of S.K. v. Finland (CRPD/C/26/D/46/2018) has been inadequate.

The Finnish Human Rights Institution hopes that the Committee will consider these shortcomings when assessing the implementation of the CRPD in Finland.