



# 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<sup>1</sup> at its 804th and 805th meetings,<sup>2</sup> 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 thanks the State Party for its written replies<sup>3</sup> to the list of issues prepared by the Committee.<sup>4</sup>

3. The Committee appreciates the constructive dialogue held with the State Party's delegation, which included representatives of the relevant government ministries, and the additional information submitted by the State Party in writing following the dialogue. The Committee also appreciates the active participation of the Human Rights Centre 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 Sami persons with disabilities. The current document does not, therefore, sufficiently reflect the situation for Sami persons with disabilities within their homeland and other parts of the 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 its ratification in 2016, including the following:

(a) The launch of the truth and reconciliation process for the deaf and sign language users, in 2025;

(b) The adoption of the Third National Plan on the Convention on the Rights of Persons with Disabilities (2023–2027), in 2023;

(c) The adoption of 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.

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

<sup>1</sup> [CRPD/C/FIN/1](#).

<sup>2</sup> See [CRPD/C/SR.804](#) and [CRPD/C/SR.805](#).

<sup>3</sup> [CRPD/C/FIN/RQ/1](#).

<sup>4</sup> [CRPD/C/FIN/Q/1](#).



### 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 among the central, regional and local levels and in 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 late 2023 and in the current 2026 budget proposal, which disproportionately affect persons with disabilities and their representative organizations, and the discontinuation of national pensions and allowances to persons living outside the State Party's territory, which gravely affects 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 with and with the active involvement of persons with disabilities, through their representative organizations:**

(a) **Coordinate the efforts of the central, regional and local governments 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, ensuring that it is fully aligned with the Convention;**

(c) **Ensure that no further 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 from the Åland Islands residing in Sweden receive the requisite financial assistance, either by providing it itself or by duly coordinating those responsibilities with the Swedish authorities;**

(d) **Develop legally entrenched processes for close consultation and active involvement of persons with disabilities, through their representative organizations, including in welfare service 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 (1325/2014) do not ensure accessibility in practice or 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 Disability Services Act (380/1987) may exclude many persons with disabilities from services that are required under the Convention;

(d) The Government's 2025 proposed amendment to the Disability Services Act, which is currently under preparation and has not yet been submitted to Parliament and which seeks to distinguish between requirements for assistance and support normally associated with a given stage of life, would, in its current form, discriminate on the basis of age and would be incompatible with article 1 of the Convention;

(e) There is no comprehensive strategy for the promotion and use of Easy Read;

(f) There is a lack of information on cases in which the Finnish courts have invoked the Convention, and direct references to the Convention are reportedly rare and usually of a pro forma nature;

(g) A scientific study found that persons with disabilities continue to experience discrimination.

**9. The Committee recommends that the State Party, in close consultation with and with the 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 reintroducing the obligation to draw up site-specific equality plans in early childhood education and care;**

(b) **Consider conferring on the National Non-Discrimination and Equality Tribunal jurisdiction 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 entitlements under the Convention;**

(d) **Refrain from introducing the life stages criterion 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 sectors;**

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

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

#### **Women with disabilities (art. 6)**

10. The Committee is concerned that the Government Gender Equality Programme (2024–2027) and other gender policies, including those on gender-based violence, do not:

(a) Mainstream disability, have an intersectional approach or expressly address the requirements of Roma, Sami and migrant women and girls with disabilities;

(b) Contain effective mechanisms for implementation, monitoring and accountability.

**11. The Committee recommends that the State Party:**

(a) **Mainstream disability into 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, Sami and migrant women and girls with disabilities;**

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

**Children with disabilities (art. 7)**

12. The Committee is concerned that:

- (a) The Open Government Action Plan (2023–2027) only implicitly includes children with disabilities;
- (b) Services and support for children with disabilities do not always enable them to live with their families in the community;
- (c) Children with disabilities face barriers in access to healthcare 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 to ensure that those requirements and views are given due weight in accordance with their age and maturity.

**13. The Committee recommends that the State Party, in close consultation with and with 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 the Open Government Action Plan (2023–2027);**
- (b) **Provide adequate and appropriate services and support for children with disabilities, including children with intellectual and/or psychosocial disabilities, to live with their families in the community, ensure that deaf children who have cochlear implants can learn sign language and participate in deaf culture, and provide adequate support mechanisms to this end;**
- (c) **Guarantee access for children with disabilities to healthcare services, including mental health services, and raise awareness among healthcare personnel of the rights and requirements of children with disabilities;**
- (d) **Improve accessible mechanisms for consulting children with disabilities on all matters affecting them and provide accessible, age-appropriate information and support so that children with disabilities can participate in these mechanisms.**

**Awareness-raising (art. 8)**

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

**15. The Committee recommends that the State Party, in close consultation with and with the active involvement of persons with disabilities, through their representative organizations, design and implement a long-term, comprehensive awareness-raising programme on the rights of persons with disabilities that covers all State entities and all parts of society, including public and private educational settings, and has 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 the State Party has not opted in to annex III of the European Accessibility Act, on 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 2022 report on the accessibility of public transport travel chains of the Ministry of Transport and Communications;

(c) Persons with intellectual disabilities face barriers in access to essential online services; Easy Read versions of public information, particularly that provided by municipalities, are rarely available; and universal design is seldom applied by public and private actors.

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

(a) **Enact legislation on accessibility of the entire built environment, extend accessibility requirements to existing buildings not subject to renovations or alterations, develop and explicitly require tactile, visual, auditive, language and other sensory accessibility measures and opt into annex III of the European Accessibility Act, on 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 robust 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. The Committee is concerned about:

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

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

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

**19. The Committee recommends that the State Party, in close consultation with and with 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 on grounds of disability;**

(b) **Ensure that advice on resuscitation, treatment in intensive care or life-supporting treatment is provided to the families of children with disabilities on an equal basis with others and does not include proposals to limit such treatment on grounds of disability;**

(c) **Eliminate all forms of substitute decision-making regarding medical interventions and guarantee that the free and informed personal consent of persons with disabilities is required 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 adaptation, including in the Åland Islands;

(b) The insufficient mechanisms for organizations of persons with disabilities, including those in the Åland Islands, and for Sami persons with disabilities to be closely consulted on 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 due to the cessation of the pilot programme on sign language emergency calls via video link and the postponement of real-time text for emergency calls until 2027.

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

(a) **Ensure that the legislative, policy and implementation frameworks on humanitarian action, disaster risk reduction, civil protection and climate change include 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 organizations of persons with disabilities, including those in the Åland Islands, and for Sami 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 the implementation of relevant European Union directives and developing 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 number of persons with disabilities under guardianship and the insufficient legal and policy measures, despite the reforms to the Guardianship Services Act (442/1999), 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 service counties that can limit access to this service;

(c) Insufficient measures to mitigate the risk arising from the ratification of the Convention on the International Protection of Adults that substitute decision-making measures and institutionalization will be promoted.

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

(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 that it meets the standards and principles of the Convention, clearly define the service's application and extend its scope beyond the Disability Services Act, and ensure that access is not restricted by the guidelines of welfare service counties;**

(c) **Monitor and assess the impact of the implementation of the Convention on the International Protection of Adults on persons with disabilities and their right to self-determination, to determine that there is no regression with regard to the Convention on the Rights of Persons with Disabilities.**

#### **Access to justice (art. 13)**

24. The Committee notes with concern:

(a) The insufficient provision of procedural and age-appropriate accommodation 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 delay the provision of essential support to children and adults with disabilities for long periods of time and administrative court decisions referring matters back to the county, effectively requiring the same process to be repeated, without reasonable prospect of success;

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

(d) The lack of resources, including funding for organizations of persons with disabilities, to provide legal advice and advocacy and to participate in the design and delivery of training for 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 with and with the active involvement of persons with disabilities, through their representative organizations:**

(a) **Implement a comprehensive, mandatory strategy to ensure the provision, free of charge, of procedural and age-appropriate accommodations for persons with disabilities 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;**

(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 without a reasonable prospect of success;**

(d) **Take measures to ensure the rights of victims with disabilities and of persons with disabilities who are suspected or accused of an offence, in line with the Convention and obligations under European law, including Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims and Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence, and the European Union Strategy on victims' rights (2020–2025);**

(e) **Provide adequate resources and funds to organizations of persons with disabilities so that they can provide legal advice and advocacy to persons with disabilities and participate in the design and delivery of training for judicial and administrative personnel.**

**Liberty and security of person (art. 14)**

26. The Committee notes with concern:

(a) The lack of measures to repeal laws and legal provisions allowing the involuntary detention of persons with disabilities on the basis of impairment;

(b) The lack of clarity on the State Party's position regarding its future participation in any process to adopt 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 with and with the active involvement of persons with disabilities, through their representative organizations:**

(a) **Ensure that disability is not a reason to deprive a person of their liberty under any law, including the Mental Health Act (116/1990) and the Act on Special Care for Persons with Intellectual Disabilities (519/1977), 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, and its open letter of January 2025 to the Secretary General of the Council of Europe, the Committee of Ministers, the Committee on Bioethics, the Steering Committee for Human Rights, the Commissioner for Human Rights, the Parliamentary Assembly and other organizations and entities of the Council of Europe, promote a 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 to adopt 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, facilities for the care of older persons, prisons and early childhood and primary education;

(b) That oversight, monitoring and reporting of harmful practices, such as forced treatment, restrictive practices and impairment-based detention, which are not sufficiently accessible to 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 with and with the active involvement of persons with disabilities, through their representative organizations, take all legislative, administrative and judicial measures necessary:**

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

(b) **To 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 by domestic law but 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 and children;

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

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

**31. Recalling its general comment No. 3 (2016) on women and girls with disabilities, the Committee recommends that the State Party, in close consultation with and with the active involvement of persons with disabilities, including women and girls with disabilities, through their representative organizations:**

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

(b) **Transpose Directive (EU) 2024/1385 into national law and policy and substantially strengthen the intersectional components and specific measures to address the situation of women and girls with disabilities in the 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 and carry out capacity-building to recognize 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 that:

(a) The State Party retains section 2 of the Act on Sterilization (283/1970), as well as laws and policies that allow for abortion and contraception in the case of women and girls with disabilities without their free and informed personal consent;

(b) Despite the State Party's leading role in the adoption of Human Rights Council resolution 55/14 on combating discrimination, violence and harmful practices against intersex persons, measures to protect intersex children from unnecessary and deferrable medical interventions in the State Party remain insufficient.

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

(a) **Repeal section 2 of the Act on Sterilization and take all legislative, policy and administrative measures necessary to prohibit the provision of sterilization, abortion and contraception in the case of persons with disabilities without their free and informed personal consent and to provide effective remedies for victims of forced sterilization, abortion and contraception;**

(b) **Adopt and implement a legislative and policy framework to explicitly prohibit the performance of medically unnecessary and deferrable procedures,**

**including surgical, hormonal and other medical treatment, on intersex minors, and provide criminal, civil and administrative remedies, healthcare and psychosocial support to intersex persons who have been subjected to genital mutilation.**

#### **Liberty of movement and nationality (art. 18)**

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

**35. The Committee recommends that the State Party withdraw and reconsider proposals before Parliament to restrict access to healthcare, including urgent care, for undocumented migrants with disabilities and migrants with disabilities who are in an irregular situation, and ensure their access to non-urgent healthcare, 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 persons with disabilities, including children and older persons with disabilities, from being institutionalized due to inaccessible housing in the community, restrictions on personal assistance and inequity across welfare service counties and in the application of the Disability Services Act and the Social Welfare Act (710/1982);

(b) The lack of social services in Swedish and accessible housing options for persons with disabilities from the Åland Islands, which results in relocation to Sweden and unclear jurisdictional responsibilities for financing, care, social insurance, 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, and the report of the Special Rapporteur on the rights of persons with disabilities on the transformation of services for persons with disabilities,<sup>5</sup> the Committee recommends that the State Party, in close consultation with and with the active involvement of persons with disabilities, through their representative organizations:**

(a) **Implement a coordinated deinstitutionalization strategy, with timelines and financial resources, across all its territories and applicable to 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 support and services, including accessible housing, home support and personal assistance, that respects self-direction and individual control, does not entail age limits, service fees or waiting lists and ensures equity across welfare service counties and in the application of the Disability Services Act and the Social Welfare Act;**

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

<sup>5</sup> [A/HRC/52/32](#).

**Personal mobility (art. 20)**

38. The Committee is concerned about:

(a) The insufficient availability of accessible public transport and the discretionary criteria used by welfare service counties for granting access to transport services;

(b) Restrictive amendments to criteria for access to 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 the availability of accessible public transport and private or shared complementary transport options throughout the territory and establish harmonized guidelines across all welfare service 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 affordable technical aids, including vehicles and assistive technologies, and eliminate bureaucratic barriers to access to technical aids.**

**Freedom of expression and opinion, and access to information (art. 21)**

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

41. **The Committee recommends that the State Party, in close consultation with and with the active involvement of persons with disabilities, through their representative organizations, ensure the implementation of Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies; guarantee that official information and websites are accessible, including through the use of audio description, Easy Read and 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 by 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 about:

(a) The lack of awareness, among persons with disabilities, their families and representative organizations and relevant professionals, of mechanisms, including complaint and accountability mechanisms, to protect the privacy of persons with disabilities in institutions;

(b) The potentially invasive nature of procedures to evaluate requirements for personal assistance and other in-home support.

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

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

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

**Respect for home and the family (art. 23)**

44. The Committee is concerned that:

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

(b) Staff of 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, fertility treatment and adoption procedures are accessible for persons with disabilities and available in sign language, including Finland Swedish sign language;**

(b) **Increase awareness of and capacity-building on the rights of persons with disabilities for staff providing general and specialized 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 about:

(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 in the Åland Islands, as well as the lack of retention and limited educational attainment of students with disabilities;

(d) The denial of enrolment to students with disabilities in higher education on the basis of safety criteria and the inaccessibility of university student information systems and websites.

47. **The Committee recommends that the State Party, in close consultation with and with the 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 programmes on the right to inclusive education of persons with disabilities, converting segregated education centres into support centres for inclusive education, redirecting resources to support mainstream educational centres, ensuring the provision of reasonable accommodation for students with disabilities, including individualized learning plans, and guaranteeing that educational performance is evaluated without discrimination;**

(b) **Improve training for education professionals in the rights of persons with disabilities and inclusive education, expand the number of qualified teachers, increase the recruitment of teachers with disabilities and ensure that 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 that all students with disabilities can access, remain in and pursue their education on an equal basis with others;**

(d) **Review admissions procedures in higher education to ensure that students with disabilities have access to and can pursue their professional training on an equal basis with other students, eliminate requirements restricting or limiting their academic training on the basis of impairment 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 about:

(a) inequities in health services for persons with disabilities across welfare service counties and a lack of disability inclusion and accessibility in the digitalization of health services;

(b) The fact that the increase in the price of specific medication and treatment disproportionately restricts access to health for persons with disabilities, particularly those with lower incomes.

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

(a) **Ensure that welfare service counties abide by guidelines on the right to health of persons with disabilities, which should be consistent throughout the State Party, that health services are not contingent upon the place of residence, that telemedicine and remote care services are available in Finnish and Finland Swedish sign language and that online portals are accessible to users of 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 those 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 among different rehabilitation services, public entities and levels of government, thus restricting access for persons with disabilities to comprehensive habilitation and rehabilitation programmes.

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

(a) **Take a human rights-based approach in 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 language, Easy Read, pictograms and Braille, and on digital media;**

(b) **Render procedures for habilitation and rehabilitation services accessible and establish monitoring and complaint mechanisms to guarantee effective implementation.**

**Work and employment (art. 27)**

52. The Committee is concerned about:

(a) Structural and entrenched prejudice and negative stereotypes about the capacity and productivity of persons with disabilities, which lead to barriers to their access to employment;

(b) The low participation of persons with disabilities in the open labour market and the insufficient data thereon;

(c) The lack of affirmative measures to promote the employment of persons with disabilities.

53. **The Committee recommends that the State Party, in close consultation with and with the 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 stigmatization, discrimination and stereotypes about their labour skills and ensuring the accessibility of public and private online employment portals, adequate training of recruitment and human resources personnel in the public and private sectors and the provision of disability-inclusive training on occupational risk prevention;**

(b) **Collecting data and compiling statistics on access to employment by persons with disabilities, disaggregated by gender, age, Indigenous identity, geographical location and type of impairment;**

(c) **Actively promoting the employment of persons with disabilities, considering the implementation of affirmative action, such as subsidy systems and incentives for employers, disseminating information on financial support for entrepreneurial initiatives by 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 the scaling back of the social security system, have disproportionately affected persons with disabilities, particularly persons with psychosocial disabilities and persons with disabilities with lower incomes or higher support requirements, and that these reforms have been carried out without comprehensive disability impact assessments;

(b) The limited funding of the welfare service counties leads to restrictive practices in access to disability entitlements, endangering the enjoyment of the rights under the Convention;

(c) Measures are lacking to ensure access to social benefits for persons with disabilities who have had to relocate 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, ensure that these measures do not adversely affect the standard of living of persons with disabilities, and provide information on disability benefits in accessible formats;**

(b) **Ensure that the welfare service counties receive a budget that allows for the provision of disability entitlements in accordance with the Convention;**

(c) **Take urgent measures to guarantee access to social benefits for persons with disabilities who have had to relocate to Sweden.**

#### **Participation in political and public life (art. 29)**

56. The Committee is concerned about:

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

(b) Persistent accessibility barriers at polling stations and deficiencies in guaranteeing the secrecy of ballots;

(c) The limited allocation of resources, including by the Funding Centre for Social Welfare and Health Organizations, to projects for organizations of persons with disabilities;

(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 with and with the active involvement of persons with disabilities, through their representative organizations:**

(a) **Develop educational programmes on the electoral rights of persons with disabilities to promote and their active participation in public and political life, with a view to their standing for election and participating in all decision-making bodies, and collect data on the participation of persons with disabilities in elections as candidates and as voters;**

(b) **Ensure the 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 that is accessible for persons with disabilities;**

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

(d) **Adopt a strategy for the implementation of the new Åland Islands electoral legislation.**

#### **Participation in cultural life, recreation, leisure and sport (art. 30)**

58. The Committee is concerned about:

(a) The low participation of persons with disabilities in sports and cultural activities;

(b) The high cost of adapted sports equipment for persons with disabilities, which limits or restricts 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 (390/2015) on the participation of persons with disabilities in cultural, recreational, leisure and sports activities in the Åland Islands.

59. **The Committee recommends that the State Party, in close consultation with and with the 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 the accessibility of 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 in 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 systems for the comprehensive collection of data and compilation of statistics on disability nationwide, including in the Åland Islands, for the purposes of framing policies on the implementation of the Convention and monitoring compliance with it.**

**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 the active involvement and close consultation 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) The reduction in the activities of the Advisory Board for the Rights of Persons with Disabilities, including its involvement in the municipal disability councils and welfare service counties, thus limiting the participation of organizations of persons with disabilities in the monitoring and implementation of the Convention;

(b) The reduction of funding for organizations of persons with disabilities, which hampers their ability to play their fundamental role in monitoring the implementation of the Convention;

(c) The State Party's remark during the constructive dialogue that organizations of persons with disabilities can operate autonomously with private funding.

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 and other coordination mechanisms;**

(b) **Provide support to organizations of persons with disabilities to allow them to get involved and participate fully in monitoring the implementation of the Convention by, inter alia, providing them with 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 so that they can fulfil their role under the Convention autonomously.**

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

66. The Committee emphasizes the importance of all the recommendations contained in the present concluding observations. With regard to urgent measures that must be taken, the Committee would like to draw the State Party's attention to the recommendations contained in paragraphs 7, on general principles and obligations, 36, on living independently and being included in the community, and 46, on education.

67. The Committee requests the State Party to implement the recommendations contained in the present concluding observations. It 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 in the Åland Islands, as well as to the media.

68. The Committee requests the State Party to disseminate the present concluding observations widely, including to non-governmental organizations and organizations of persons with disabilities, and to persons with disabilities themselves 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 to fifth periodic 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<sup>6</sup> 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 their submission.

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<sup>6</sup> General Assembly resolution 79/165, para. 6.