



Convention on the Rights of Persons with Disabilities

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Committee on the Rights of Persons with Disabilities

List of issues in relation to the initial report of Finland*

A. Purpose and general obligations (arts. 1–4)

1. Please inform the Committee about:
 - (a) Measures taken to harmonize legislation, policies and practices with the human rights model of disability enshrined in the Convention, including with regard to the regulation of self-determination and legislation on non-discrimination;
 - (b) The compatibility with the Convention of the legally established criteria for the certification of disability;
 - (c) The implementation of the new Disability Services Act (675/2023), in particular in relation to the criteria for applying for personal assistance services, and the human and financial resources allocated for disability services in the 21 welfare service counties, the city of Helsinki and the Åland Islands;
 - (d) Progress made in implementing the National Action Plan on the Convention on the Rights of Persons with Disabilities 2020–2023 and the “An Accessible Åland” action programme for the disability policy of the Åland provincial government for the period 2022–2025;
 - (e) The impact of austerity measures on the rights of persons with disabilities;
 - (f) The level of regional and local cooperation, the resources allocated to municipal disability councils and welfare service counties and the measures taken to closely consult and actively involve persons with disabilities, through their representative organizations, in those mechanisms;
 - (g) Consultation with and the involvement of persons with disabilities, through their representative organizations, including those of persons with disabilities belonging to minorities, such as Romani people and Sami, in the implementation and monitoring of the Convention, and the funds allocated to empower them.

B. Specific rights (arts. 5–30)

Equality and non-discrimination (art. 5)

2. Please provide information on:
 - (a) The measures taken to strengthen the Non-Discrimination Ombudsman, the Åland Non-Discrimination Ombudsman and the National Non-Discrimination and Equality Tribunal to ensure efficiency and accountability for disability-related discrimination;

* Adopted by the pre-sessional working group at its eighteenth session (11–14 September 2023).



(b) The actions taken to prevent and eliminate multiple and intersecting forms of discrimination on the grounds of disability, age, sex, ethnicity, religion, language, origin, nationality, migration status, intersex traits, sexual orientation and gender identity;

(c) The steps taken to review the Non-Discrimination Act (1325/2014) to recognize denial of reasonable accommodation as a form of discrimination on the basis of disability in all areas of life, including housing and political participation;

(d) The number of claims of discrimination on the basis of disability made since 2016 and that number as a percentage of the overall number of claims of discrimination, disaggregated by sex, age, the type of barrier identified as the basis of the claim and the sectors or social areas concerned, for example, education, employment, goods and services, facilities, culture and personal assistance and welfare services, and the number of claims that resulted in penalties for perpetrators and redress for victims;

(e) Decisions of district courts, courts of appeal and the Supreme Court relating to discrimination against persons with disabilities in which the Convention was invoked.

Women with disabilities (art. 6)

3. Please inform the Committee about:

(a) The extent to which gender equality legislation and policies, including the Government Action Plan for Gender Equality 2020–2023, incorporate the human rights model of disability and how disability legislation and policies incorporate a gender perspective and protect the rights of women and girls with disabilities;

(b) The actions taken to empower women and girls with disabilities, in particular those belonging to minorities, such as Romani people and Sami, and those from immigrant backgrounds, in all areas of life.

Children with disabilities (art. 7)

4. Please provide information on:

(a) Actions taken to ensure that national policies for children address the situation of children with disabilities and guarantee their inclusion in the community;

(b) Steps taken to ensure close consultation with and the active involvement of children with disabilities in all matters affecting them and ensure that their views are given due weight, in accordance with their age and maturity, in decision-making processes affecting them;

(c) Measures taken to ensure that children with disabilities who have cochlear implants can learn sign language and participate in deaf culture.

Awareness-raising (art. 8)

5. Please inform the Committee about:

(a) Strategies adopted to promote awareness of the rights of persons with disabilities under the Convention, including periodic campaigns targeting persons with disabilities themselves, their families and the general public, and the extent to which organizations of persons with disabilities are involved in those activities;

(b) Efforts made to provide systematic training on the Convention for public officials, professionals in health and social services, educators, law enforcement officers, members of the judiciary, Members of Parliament, building operators and private actors and how the impact of awareness-raising initiatives is evaluated;

(c) Actions taken to modify and eradicate stereotypes of and prejudices and harmful practices against persons with disabilities in all aspects of life, including in schools and in the media;

(d) Measures taken to tackle ableist policies and practices that underpin prenatal genetic screening for fetal impairments.

Accessibility (art. 9)

6. Please provide information on:

- (a) Plans to ensure the implementation of universal design and accessibility standards in the public and private sectors, taking into account the diverse requirements of persons with disabilities, and the involvement of persons with disabilities in those initiatives;
- (b) Mechanisms to monitor the implementation of accessibility standards in the areas addressed in the Convention and the measures applicable for non-compliance;
- (c) The accessibility of buildings, efforts to broaden the scope of the Government Decree on Accessibility of Buildings (241/2017) with the aim of enhancing the accessibility of the built environment, and the funding allocated to guarantee the full accessibility of buildings open to the public and of public transportation;
- (d) Measures taken to ensure access to information and communications technologies, including accessible online banking services, and the websites and mobile applications of public sector bodies;
- (e) Efforts made to align legislation with Directive (EU) No. 2019/882 of the European Parliament and of the Council of the European Union on the accessibility requirements for products and services and to guarantee access to products and services not covered by the Directive.

Right to life (art. 10)

7. Please inform the Committee about actions taken to ensure the provision of resuscitation, intensive care and life-sustaining treatments to persons with disabilities, including children with disabilities, on an equal basis with others.

Situations of risk and humanitarian emergencies (art. 11)

8. Please provide information on:

- (a) The inclusiveness and accessibility of disaster risk reduction measures and disaster management strategies, including on the Åland Islands, as described in the Sendai Framework for Disaster Risk Reduction 2015–2030, and the extent to which those measures and strategies take into account the diverse requirements of persons with disabilities;
- (b) Measures to mainstream the rights of persons with disabilities into the Handbook on Risk Management and Safety Planning and in the context of the development of the forthcoming national pandemic preparedness plan and the monitoring of the Emergency Powers Act (1552/2011);
- (c) Measures adopted to ensure close consultation with and the active involvement of persons with disabilities, through their representative organizations, including those of women and girls with disabilities, in all stages of the development, implementation and monitoring of strategies and plans on disaster risk reduction and emergencies;
- (d) Efforts made to ensure the accessibility of emergency announcements broadcast on radio and television, the national emergency number (112), the emergency text-messaging service, evacuation plans and early warning systems;
- (e) Measures included in recovery plans to address the negative impact of the coronavirus disease (COVID-19) pandemic on persons with disabilities;
- (f) Actions adopted to mainstream the rights of persons with disabilities into climate change policies, and the extent to which persons with disabilities have been closely consulted on and actively involved in the formulation and implementation of those initiatives.

Equal recognition before the law (art. 12)

9. Please inform the Committee about:

- (a) Progress made in reforming the Guardianship Services Act (442/1999) in order to recognize the full legal capacity of persons with disabilities, in particular persons with

intellectual and/or psychosocial disabilities, and reforms of any other legislation that limits their legal capacity;

(b) Measures taken to replace substitute decision-making with supported decision-making systems that respect the autonomy, will and preference of persons with disabilities in all areas of life, including with regard to access to financial services and the management of property;

(c) The number of persons under guardianship and the number of persons whose legal capacity has been reinstated since the ratification of the Convention, disaggregated by age, sex and type of impairment.

Access to justice (art. 13)

10. Please provide information on:

(a) Measures taken to ensure that persons with disabilities, in particular persons with intellectual and/or psychosocial disabilities, have access to legal remedies against all forms of discrimination on the basis of disability and are guaranteed access to justice at all stages of judicial and administrative proceedings, including through the provision of procedural and age-appropriate accommodations;

(b) Measures taken to reduce delays in assessing requirements for disability and welfare services, including delays in appeal processes, and ensure the provision of timely and effective remedies;

(c) Measures taken to train public officials, lawyers, prosecutors, judges and court employees on the rights enshrined in the Convention.

Liberty and security of person (art. 14)

11. Please inform the Committee about:

(a) Initiatives introduced to repeal laws and practices that permit the detention of persons on the basis of actual or perceived impairment, including forced hospitalization and institutionalization;

(b) Measures taken to guarantee the accessibility of the physical environment and information and communications technologies, provide reasonable accommodation and ensure equal opportunities for persons with disabilities in prisons;

(c) The current position of the State party with regard to the ongoing process towards the adoption of a draft additional protocol to the Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine on the protection of the human rights and dignity of persons with mental disorders with regard to involuntary placement and involuntary treatment.

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

12. Please provide information about:

(a) Actions adopted to protect persons with disabilities from torture or cruel, inhuman or degrading treatment or punishment in all settings, including prisons, health-care facilities and institutions;

(b) The revision of the Mental Health Act (1116/1990) and the steps taken to prohibit and eliminate the coercive and involuntary treatment of adults and children with disabilities, including the involuntary administration of medication and the use of isolation, restraint and restriction of movement, and to ensure effective remedies in those cases;

(c) Measures taken to ensure that all medical treatment is based on the free and informed consent of the individual concerned.

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

13. Please inform the Committee about:

- (a) Strategies for the prevention and eradication of all forms of violence and abuse against persons with disabilities, in particular women, children and young people with disabilities, in close consultation with their representative organizations, and measures taken to address the situation of women and girls with disabilities as part of the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence;
- (b) Steps taken to provide accessible complaint mechanisms and gender- and age-sensitive recovery, rehabilitation and social reintegration services and programmes for persons with disabilities who have been subjected to violence and abuse;
- (c) Measures taken to ensure the incorporation of the human rights model of disability into the Programme for the Reduction of Violence against Women 2020–2023, guarantee the accessibility of the “Nollalinja” 24-hour helpline and expand the network of accessible shelters, in particular in the northern region, the Sami homeland;
- (d) Actions adopted to ensure that violence and abuse against persons with disabilities, including hate crimes and sexual harassment, are duly recorded, investigated, prosecuted and punished;
- (e) The number of cases of exploitation of or violence or abuse against persons with disabilities reported since 2016, disaggregated by sex, age, type of impairment, specific offence and geographical location, and the investigations conducted, penalties imposed on the perpetrators and reparations awarded to the victims in those cases.

Protecting the integrity of the person (art. 17)

14. Please provide information on:

- (a) Actions taken to review the laws and policies in place, including the Act on Sterilization (283/1970), to prohibit the forced sterilization of, forced performance of abortions on and forced administration of contraception to women and girls with disabilities and to detect and prevent such cases and punish the perpetrators;
- (b) Legislative and policy measures to protect intersex children from irreversible and unnecessary surgical interventions.

Liberty of movement and nationality (art. 18)

15. Please inform the Committee about:

- (a) The incorporation of the human rights model of disability into the Aliens Act (301/2004);
- (b) Safeguards against forced relocation in the event of a lack of adequate housing in a person’s municipality of origin;
- (c) The number of asylum-seekers, refugees and migrant workers with disabilities, disaggregated by sex, age and country of origin, and measures taken to ensure their access to social and health-care services;
- (d) The impact of the exemption from the language skills requirement on grounds of health or disability in the context of applications for Finnish nationality.

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

16. Please provide information on:

- (a) Actions adopted to accelerate deinstitutionalization for all persons with disabilities, in particular children and older persons with intellectual and/or psychosocial disabilities, and to avoid institutionalization in group homes;
- (b) Measures taken to provide community-based support and ensure a sufficient number of trained personnel, an adequate budget and coordination of such support;

(c) Efforts made to strengthen in-home support and personal assistance, in close consultation with and with the active involvement of persons with disabilities, through their representative organizations, in those endeavours;

(d) The resources allocated to the welfare service counties and municipalities for the provision of support through high-quality personal assistance, taking into account the requirements of the individual concerned, and an appropriate number of hours of support, including for leisure activities. Please indicate the number of persons with disabilities who have received personal assistance since 2016, disaggregated by year, sex, age, type of impairment and municipality of residence;

(e) The funding and programmes available for the development of accessible and affordable housing in the community;

(f) The implementation of the Views adopted by the Committee concerning communication No. 46/2018,¹ which related to the eligibility criteria for personal assistance;

(g) The number of children with disabilities who have lived in institutions or care facilities since 2016, disaggregated by type of impairment, age, gender and ethnicity, and the actions taken to end their institutionalization and guarantee their right to family life on an equal basis with other children.

Personal mobility (art. 20)

17. Please inform the Committee about:

(a) Actions adopted to facilitate access to public transportation and personal mobility aids and devices, including assistive technology, for persons with disabilities throughout the country, in urban and rural areas;

(b) The mechanism in place to monitor transportation services to ensure that personalized transportation services in line with individual requirements are provided in situations in which public transportation is not available, that drivers have the necessary professional skills and that procurement contracts provide for adequate penalties for non-compliance by service providers, and the impact of the 2018 reform of taxi legislation;

(c) Efforts made to introduce more flexibility in the transportation system and to prevent the introduction of a monthly cap on access to transportation services in both urban and rural areas;

(d) Initiatives introduced to provide financial support towards the purchase of a car and the cost of car adaptations for persons with disabilities.

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

18. Please provide information on:

(a) Measures taken to ensure the full access of all persons with disabilities to public information, including at public events and on television, the radio and the Internet, through, inter alia, sign language, Braille, audio or tactile information, captioning, Easy Read, pictograms and augmentative and alternative communication;

(b) Actions taken to ensure that the linguistic rights of persons with disabilities are upheld on an equal basis with those of other persons throughout the country, in particular in the social services and health sectors and in interactions with the police;

(c) The number and geographical distribution of sign language interpreters and efforts to improve the quality of the interpretation services provided by the Social Insurance Institution (Kela) and address the high turnover of interpreters.

¹ *S.K. v. Finland* (CRPD/C/26/D/46/2018).

Respect for privacy (art. 22)

19. Please indicate the steps taken to protect the privacy of persons with disabilities, in particular persons with intellectual and/or psychosocial disabilities, including the confidentiality of their personal information concerning housing, health and social services.

Respect for home and the family (art. 23)

20. Please inform the Committee about:

(a) Actions taken to ensure that persons with disabilities, in particular women with disabilities, can make decisions about parenting and family planning and that children are not separated from their families because the child or one of the parents (or both parents) has a disability;

(b) Support available to parents with disabilities and the parents of children with disabilities to enable them to exercise their parental responsibilities on an equal basis with others.

Education (art. 24)

21. Please provide information on:

(a) Measures taken to implement a comprehensive inclusive education strategy in mainland Finland and Åland at all levels of education;

(b) The accessibility of the physical environment and information and communications in regular schools and higher education settings;

(c) Measures taken to ensure that students with disabilities, regardless of type of impairment, have access to individualized support, inclusive learning methodologies and materials, adaptive learning environments and reasonable accommodation, such as textbooks in Braille, Easy Read and accessible electronic formats and sign language interpreters;

(d) The training provided for teachers and non-teaching education personnel, including school counsellors, on inclusive education and measures taken to raise awareness of the rights of persons with disabilities in order to reduce stigma, discrimination and bullying in all educational settings;

(e) Efforts to overcome disparities in access to early childhood, primary, secondary and higher education;

(f) Initiatives to broaden the range of fields of study in vocational education;

(g) The number of children with disabilities who have had access to education since 2016, disaggregated by age, sex, type of impairment, type of school and municipality.

Health (art. 25)

22. Please inform the Committee about:

(a) Actions adopted to ensure that persons with disabilities have access to the highest attainable standard of health-care services and products in the public and private sectors, on an equal basis with others, in mainland Finland and Åland;

(b) How age-appropriate sexual and reproductive health services and comprehensive sexuality education are provided to all persons with disabilities, in particular women and girls with disabilities;

(c) Measures taken to ensure the accessibility of health-care facilities, equipment and information and communications technologies, including Braille, sign language, Easy Read and augmentative and alternative communication, in the health-care system;

(d) The periodic training provided to health-care personnel on the human rights model of disability, autonomy and the requirements of persons with disabilities, and the measures taken to evaluate the impact of such training;

(e) The availability of community-based mental health services throughout the territory of the State party, in particular for children and young persons with disabilities.

Habilitation and rehabilitation (art. 26)

23. Please update the Committee about:

(a) The outcome of the reform of the rehabilitation system initiated in 2016 and the coordination mechanism for the implementation of habilitation and rehabilitation services in mainland Finland and Åland;

(b) Measures adopted to expand habilitation and rehabilitation services and eligibility for rehabilitation to ensure that all persons with disabilities, in particular children and older persons, have access to those services in their communities;

(c) Steps taken to ensure that rehabilitation services provided by the State party, in particular in the areas of health, employment, education and social services, are based on individual requirements, without any limitation on grounds such as age or medical condition;

(d) Efforts made to guarantee the timely access of persons with disabilities to individual habilitation and rehabilitation plans, personalized assistive devices and services for the maintenance and repair of assistive devices, and the legal remedies available to persons with disabilities who have been denied access to assistive devices.

Work and employment (art. 27)

24. Please inform the Committee about:

(a) Actions adopted to prevent and punish discrimination against persons with disabilities in work and employment and the progress made in promoting employment opportunities for them in the open labour market, in both the public and the private sectors, and in mainland Finland and Åland;

(b) Efforts to implement the “linear model” to increase employment opportunities for persons with disabilities and balance earned income with the disability pension;

(c) Steps taken to support persons with disabilities, in particular persons with intellectual and/or psychosocial disabilities, to exercise their right to freely choose or accept employment in work environments that are open, inclusive and accessible to them;

(d) Measures taken in workplaces to ensure the accessibility of work environments and the provision of reasonable accommodation and supports on the basis of individual requirements;

(e) Initiatives introduced to strengthen the involvement of persons with disabilities in entrepreneurship and ensure their access to financial support, technical advice, digital tools and technical and professional orientation programmes outside sheltered employment;

(f) Efforts made to improve the collection of data on persons with disabilities employed in the public and private sectors, including by ensuring that such data are disaggregated by sex, age, ethnicity, type of impairment and place of residence.

Adequate standard of living and social protection (art. 28)

25. Please provide information on:

(a) Measures taken to ensure adequate levels of social protection and efforts made to reduce poverty among persons with disabilities;

(b) The extent to which disability allowances adequately cover the living costs of persons with disabilities and the steps taken to streamline the application process and reduce processing times to facilitate access to those entitlements;

(c) The impact of the reform of the social welfare system on persons with disabilities, and the transfer of responsibility for the organization of services to the welfare service counties;

(d) The number of persons who have been entitled to disability benefits from the Social Insurance Institution (Kela) since 2016, disaggregated by age, sex, type of impairment, type of entitlement and place of residence.

Participation in political and public life (art. 29)

26. Please inform the Committee about:

(a) Actions adopted to ensure that polling stations, voting materials, voting procedures and political campaigns are fully accessible to all persons with disabilities, and the training provided to election officials;

(b) Efforts made to enhance the effective representation of persons with disabilities, in particular women and persons with intellectual and/or psychosocial disabilities, in political and public decision-making positions at all levels;

(c) The number of persons with disabilities who hold decision-making positions, including in Parliament, the executive branch and the judiciary, disaggregated by sex, age and type of impairment.

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

27. Please provide information on:

(a) Measures taken to improve the accessibility of sports facilities, museums, libraries, cultural and historical heritage sites, tourist attractions and any other places relevant to the cultural and recreational life of persons with disabilities;

(b) The state of implementation of Directive (EU) No. 2017/1564 of the European Parliament and of the Council of the European Union on certain permitted uses of certain works and other subject matter protected by copyright and related rights for the benefit of persons who are blind, visually impaired or otherwise print-disabled and amending Directive No. 2001/29/EC on the harmonization of certain aspects of copyright and related rights in the information society.

C. Specific obligations (arts. 31–33)

Statistics and data collection (art. 31)

28. Please inform the Committee about:

(a) Measures to conduct disability needs assessments to inform policy development and evaluation;

(b) Measures taken to systematically collect, analyse and disseminate data, disaggregated by age, sex, type of impairment, geographical location, place of residence, ethnicity and migrant or refugee status, and to develop statistics, indicators and benchmarks to measure the impact of public policies designed to implement the Convention and the resources allocated for that purpose;

(c) The close consultation and active involvement of organizations of persons with disabilities in designing and implementing tools to collect data and conduct research on the situation of persons with disabilities and in analysing and disseminating the data collected.

International cooperation (art. 32)

29. Please inform the Committee about:

(a) Actions adopted to mainstream the rights of persons with disabilities into the implementation and monitoring of the 2030 Agenda for Sustainable Development and the Sustainable Development Goals at all levels, in close consultation with and with the active involvement of organizations of persons with disabilities;

(b) Measures taken to mainstream the human rights model of disability into all development policies and programmes, including those financed by FinnFund, and the use of the “disability marker” to track the use of funds;

(c) Steps taken to continue to promote the human rights of persons with disabilities in official development assistance and to allocate resources to enable organizations of persons with disabilities to cooperate internationally.

National implementation and monitoring (art. 33)

30. Please update the Committee on:

(a) Coordination between the Ministry for Foreign Affairs and the Ministry of Social Affairs and Health, which are the focal points on disability, on the one hand, and the Advisory Board for the Rights of Persons with Disabilities, which is the national coordinating mechanism for the Convention, on the other;

(b) Steps taken to strengthen the Finnish National Human Rights Institution, which consists of the Parliamentary Ombudsman and the Human Rights Centre and its Human Rights Delegation, and provide it with sufficient resources to perform its function as an independent monitoring mechanism in compliance with the principles relating to the status of national institutions for the promotion and protection of human rights (the Paris Principles);

(c) Measures taken to strengthen the effective participation of persons with disabilities and their representative organizations in the monitoring of the Convention.
