

# Right to social inclusion and equality

The National Action Plan on  
the UN Convention on the Rights  
of Persons with Disabilities 2023–2027



Ministry of  
Social Affairs and Health

PUBLICATIONS | 2024:33  
of the Ministry of Social Affairs and Health

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The National Action Plan on the UN  
Convention on the Rights of Persons  
with Disabilities 2023–2027

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ISBN pdf: 978-952-00-8470-7  
ISSN pdf: 1797-9854

Layout: Government Administration Department, Publications

Helsinki 2024 Finland

## Right to social inclusion and equality

### The National Action Plan on the UN Convention on the Rights of Persons with Disabilities 2023–2027

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#### Publications of the Ministry of Social Affairs and Health 2024:33

<b>Publisher</b>	Ministry of Social Affairs and Health		
<b>Group author</b>	Ministry of Social Affairs and Health		
<b>Language</b>	English	<b>Pages</b>	178

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#### Abstract

The National Action Plan on the UN Convention on the Rights of Persons with Disabilities identifies the measures that will be taken to promote the implementation of the Convention in different administrative branches during the third Action Plan period 2023–2027. Work on the Action Plan has been coordinated and adapted by VANE (the Advisory Board for the Rights of Persons with Disabilities), the members of which include representatives of disability organisations and the ministries and stakeholders in a key role regarding the rights of persons with disabilities. Disability organisations and persons with disabilities were consulted during the process of drawing up the Action Plan to obtain information about those issues referred to in the Convention which the Action Plan should promote. The Action Plan consists of 13 content areas and 75 measures. The implementation of the measures will be monitored during the Action Plan period and evaluated at the end of the period. The Action Plan emphasises the inclusion and equality of persons with disabilities. In the programme work, particular emphasis has been placed on the rights of women and children with disabilities and the intersectional perspective. In economically challenging times, it has been considered particularly important to assess the impacts and combined impacts of projects on the rights of persons with disabilities. One important objective of the Action Plan is to raise awareness of the rights of persons with disabilities.

<b>Keywords</b>	equality, inclusion, accessibility, human rights, persons with disabilities		
<b>ISBN PDF</b>	978-952-00-8470-7	<b>ISSN PDF</b>	1797-9854
<b>URN address</b>	<a href="https://urn.fi/URN:ISBN:978-952-00-8470-7">https://urn.fi/URN:ISBN:978-952-00-8470-7</a>		

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## Oikeus osallisuuteen ja yhdenvertaisuuteen YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallinen toimintaohjelma 2023–2027

### Sosiaali- ja terveysministeriön julkaisuja 2024:33

**Julkaisija** Sosiaali- ja terveysministeriö

**Yhteisötekijä** Sosiaali- ja terveysministeriö

**Kieli** englanti

**Sivumäärä** 178

### Tiivistelmä

YK:n vammaisten henkilöiden oikeuksien yleissopimuksen kansallisessa toimintaohjelmassa on määritelty ne toimenpiteet, joilla vammaisyleissopimuksen täytäntöönpanoa edistetään eri hallinnonaloilla kolmannella toimintaohjelmakaudella 2023–2027. Toimintaohjelmatyötä on koordinoitunut ja yhteensovittanut vammaisten henkilöiden oikeuksien neuvottelukunta VANE, jossa ovat edustettuina vammaisjärjestöt sekä vammaisten henkilöiden oikeuksien kannalta keskeiset ministeriöt ja sidosryhmät. Toimintaohjelmaa laadittaessa on kuultu vammaisjärjestöjä ja muita sidosryhmiä ja näin saatu heiltä tietoa niistä vammaisyleissopimuksen mukaisista asioista, joita toimintaohjelmassa tulisi edistää. Toimintaohjelma koostuu 13 sisältöalueesta ja 75 toimenpiteestä. Toimenpiteiden toteutumista seurataan toimintaohjelmakauden aikana ja arvioidaan toimintaohjelmakauden päättyessä. Toimintaohjelmassa korostuvat vammaisten henkilöiden osallisuus ja yhdenvertaisuus. Ohjelmatyössä on erityisesti haluttu korostaa vammaisten naisten ja lasten oikeuksia sekä intersektionaalista näkökulmaa. Taloudellisesti haastavina aikoina on katsottu olevan erityisen tärkeää arvioida hankkeiden vaikutuksia ja yhteisvaikutuksia vammaisten henkilöiden oikeuksiin. Yhtenä toimintaohjelman tärkeänä tavoitteena on lisätä tietoisuutta vammaisten henkilöiden oikeuksista.

**Asiasanat** yhdenvertaisuus, osallisuus, esteettömyys, saavutettavuus, ihmisoikeudet, vammaiset

**ISBN PDF** 978-952-00-8470-7

**ISSN PDF** 1797-9854

**Julkaisun osoite** <https://urn.fi/URN:ISBN:978-952-00-8470-7>

## Rätt till delaktighet och likabehandling Nationellt handlingsprogram för FN:s konvention om rättigheter för personer med funktionsnedsättning 2023–2027

### Social- och hälsovårdsministeriets publikationer 2024:33

**Utgivare** Social- och hälsovårdsministeriet

**Utarbetad av** Social- och hälsovårdsministeriet  
**Språk** engelska

**Sidantal** 178

### Referat

I det nationella handlingsprogrammet för FN:s konvention om rättigheter för personer med funktionsnedsättning anges de åtgärder genom vilka genomförandet av konventionen ska främjas inom olika förvaltningsområden under den tredje handlingsprogramperioden 2024–2027. Arbetet med handlingsprogrammet har koordinerats och samordnats av delegationen för rättigheter för personer med funktionsnedsättning (VANE), som består av representanter från funktionsrättsorganisation, samt de ministerier och intressentgrupper som är centrala med tanke på rättigheterna för personer med funktionsnedsättning. Vid beredningen av handlingsprogrammet har man hört funktionsrättsorganisationerna och andra intressentgrupper. Man har därigenom fått information om vilka åtgärder i funktionsrättskonventionen som ska prioriteras i handlingsprogrammet. Handlingsprogrammet består av 13 innehållsområden och 75 åtgärder. Genomförandet av åtgärderna följs upp under programperioden och utvärderas efter att programperioden tagit slut. I handlingsprogrammet understryks delaktighet och likabehandling för personer med funktionsnedsättning. I programarbetet vill man särskilt betona rättigheterna för kvinnor och barn med funktionsnedsättning samt det intersektionella perspektivet. Under utmanande ekonomiska tider har det ansetts vara särskilt viktigt att utvärdera hur effekterna och de sammantagna konsekvenserna av projekten påverkar rättigheterna för personer med funktionsnedsättning. Ett viktigt mål för handlingsprogrammet är att öka medvetenheten om rättigheterna för personer med funktionsnedsättning.

**Nyckelord** likabehandling, delaktighet, tillgänglighet, mänskliga rättigheter, personer med funktionsnedsättning

**ISBN PDF** 978-952-00-8470-7

**ISSN PDF** 1797-9854

**URN-adress** <https://urn.fi/URN:ISBN:978-952-00-8470-7>

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## FOR THE READER

Dear reader,

In ratifying the UN Convention on the Rights of Persons with Disabilities in 2016, Finland was committed to reaffirming the full enjoyment of human rights and civil liberties for persons with disabilities as well as promoting their implementation. After the ratification, the Government issued a decree on the Advisory Board for the Rights of Persons with Disabilities (VANE), in which one of VANE's tasks was to draw up a national action plan. After the ratification, Finland has prepared a national action plan for each government term to promote the implementation of the UN Convention on the Rights of Persons with Disabilities. This Action Plan is the third in order.

The basic principles of both the Convention and this Action Plan are social inclusion and equality. In fact, the aim has been to ensure that the voice of persons with disabilities is heard in the preparation of the Action Plan in many ways. Even before work on the Action Plan was started, the University of Helsinki, commissioned by VANE, studied the experiences of persons with disabilities in the implementation of their rights.

The study by the University of Helsinki found that persons with disabilities experience great uncertainty in their lives and, for example, their inclusion is still variable. Persons with disabilities are also concerned about their employment and livelihood. These concerns are very understandable, as we live in a very turbulent and changing world. Economic concerns affect Finland, as well, and wars also cast a shadow on our lives. All this also affects the lives of persons with disabilities. In addition, persons with disabilities have a lot of special needs.

Prime Minister Orpo's Government Programme A strong and committed Finland aims to ensure that everyone in our society has the right and freedom to pursue a good life. People have a sense of inclusion and trust in each other. An economically strong Finland is able to provide society's services in a sustainable manner for current and future generations, and it is also crisis-resilient. These objectives also strengthen the rights of persons with disabilities and also create security for them in an uncertain world.

In order to safeguard their rights, persons with disabilities also need services that meet their needs. The new Disability Services Act will enter into force during this government term. Up-to-date and effective legislation safeguards the stability of society to the greatest extent and protects the fundamental rights of individuals.

The Government wants to promote open and well-functioning administration that focuses on continuity and consistent operating methods. Participation and influence are the foundations of a democratic society, and these opportunities must also be ensured for persons with disabilities.

Helsinki, 13 September 2024

Minister of Social Affairs and Health Kaisa Juuso

# 1 Frame of reference: key international documents

## 1.1 The UN Convention on the Rights of Persons with Disabilities

The UN Convention on the Rights of Persons with Disabilities (Finnish Treaty Series 26 and 27/2016; UNCRPD, the Convention) and its Optional Protocol entered into force in Finland in 2016. The purpose of the UNCRPD is to ensure that persons with disabilities can fully and equally enjoy human rights and fundamental freedoms, to promote and protect these rights and freedoms as well as to promote the respect for human dignity of persons with disabilities.

Under section 22 of the Constitution of Finland (731/1999), the public authorities must guarantee the observance of basic rights and liberties and human rights. By ratifying the UNCRPD, Finland is committed to safeguarding the rights determined under the Convention. The UNCRPD is part of the national legislation in Finland. Consequently, the authorities must take the implementation and promotion of the rights of persons with disabilities into account in all of their activities.

The UNCRPD consists of 50 articles. Its articles on the purpose, general principles and obligations of the Convention, equality and non-discrimination, women and children with disabilities, raising awareness, accessibility and access to information as well as definitions with significance to the Convention are cross-cutting provisions that should be taken into account when interpreting the contents of all the other articles.

The other articles of the UNCRPD contain more detailed provisions on national measures required under the Convention and on international cooperation, national monitoring systems, the Convention's international monitoring system and meetings of the states parties.

According to the UNCRPD, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.

The Convention raises awareness of the rights of persons with disabilities, improving their opportunities to participate in society. Raising awareness influences the position of the individual through changing attitudes. The Convention also raises awareness among persons with disabilities of their rights.

The Convention emphasises the participation of persons with disabilities and organisations representing them in all decision-making that affects them. The Convention guarantees the right of a person with disabilities to live independently as part of the community. Primary services must be accessible to persons with disabilities. Individual specialist services must also be accessible if necessary.

The Convention emphasises the importance of reasonable accommodations to ensure that the rights of persons with disabilities are respected. Denial of reasonable accommodation is discrimination.

## 1.2 2030 Agenda for Sustainable Development

The goals of the United Nation's 2030 Agenda for Sustainable Development were adopted in 2015. They are valid from the beginning of 2016 until 2030. The Sustainable Development Goals are a continuation of the United Nations Millennium Development Goals. The objective of the goals is to make the world a better place by taking into account the environment, people, human rights as well as economic aspects. These goals are universal, which means that they concern all stakeholders: the state, municipalities, companies and other actors. The goals concern all UN member states.

The Agenda for Sustainable Development emphasises the fact that all of the goals are important and interlinked. It is impossible to achieve one goal without another, and their achievement requires the input of states, decision-makers and citizens alike.

One of the important goals of the Agenda is reducing inequality and promoting peaceful, fair and inclusive societies as well as protecting human rights. The slogan of the 2030 Agenda is "Leave no one behind"). The aim is to first reach those who have been left furthest behind. Attention was already paid to giving a voice to those in the poorest and weakest positions when preparing the declaration.

The Sustainable Development Goals take into account disability and persons with disabilities. The goals refer to disability 11 times in total, especially in the contexts of education, growth and employment, inequality, accessibility, data collection and

the monitoring of set goals. Although disability is not mentioned in connection with all of the goals, they are significant for the full inclusion of persons with disabilities.

The 2030 Agenda also pays attention to the implementation of the rights of persons with disabilities, and it has thus gained prominence in international disability policy alongside with the UN Convention on the Rights of Persons with Disabilities. The long-term slogan of the disability rights movement, "Nothing about us without us", has been paired with a new one, "Leave no one behind".

## 2 National implementation of the UN Convention on the Rights of Persons with Disabilities

### 2.1 National implementation and monitoring of the UNCRPD

The Ministry for Foreign Affairs (MFA) and the Ministry of Social Affairs and Health (MSAH) are the national focal points for implementing the Convention on the Rights of Persons with Disabilities. A national coordination mechanism, the Advisory Board for the Rights of Persons with Disabilities (VANE), has been established at the MSAH. The role of the Advisory Board is to facilitate the national implementation of the Convention within central government.

The duties of the independent mechanism referred to in the Convention are carried out by the Parliamentary Ombudsman, the Human Rights Centre and its human rights delegation, which form the National Human Rights Institution. The role of this mechanism is to promote, protect and monitor the implementation of the Convention.

International monitoring of UNCRPD implementation takes the form of periodic reports submitted by the States Parties to the UN Committee on the Rights of Persons with Disabilities. The first report is to be submitted within two years after the entry into force of the Convention for the state party concerned. Finland submitted its first report to the Committee in autumn 2019. Thereafter, States Parties submit subsequent reports at least every four years and further whenever the Committee so requests. Civil society has the opportunity to submit its parallel report to the Committee. The Committee will consider the report and make its conclusions and recommendations on it.

This monitoring is complemented with the Optional Protocol, under which an individual or group can submit a communication to the Committee on the Rights of Persons with Disabilities regarding a violation of their rights recognised under the Convention. The Optional Protocol also provides for an inquiry conducted by the Committee in case of grave or systematic violations.

## 2.2 Advisory Board for the Rights of Persons with Disabilities VANE

The Advisory Board for the Rights of Persons with Disabilities (VANE) is a coordination mechanism within government referred to in the UN Convention on the Rights of Persons with Disabilities. Its purpose is to facilitate the national implementation of the Convention.

The Advisory Board operates in connection to the Ministry of Social Affairs and Health. Provisions on the board's tasks are laid down in Decree (908/2016), under which the board has the duty to promote the national implementation of the UNCRPD, help ensure that the rights of persons with disabilities are taken into account in the activities of all administrative branches, and to elect from among its members a representative of persons with disabilities for the tasks of the focal point referred to in Article 33 of the Convention.

The Advisory Board has representatives of ministries, persons with disabilities and persons close to them, labour market organisations, local and regional government and research organisations. The Advisory Board has a chair, a vice-chair, a maximum of 16 members and a full-time secretary-general. It also has one half of a senior specialist's working time at its disposal. The government appoints the Advisory Board for the Rights of Persons with Disabilities for four years at a time.

## 2.3 Action Plan

Provisions on the preparation of the Action Plan are laid down in the Government Decree on the Advisory Board for the rights of persons with disabilities (908/2016). Under the Decree, the Advisory Board must prepare an action plan for its term. The action plan must determine what the key national objectives for promoting the implementation of the Convention are, which measures are selected to promote the attainment of these objectives, and how the action plan's implementation will be monitored.

The UN Convention on the Rights of Persons with Disabilities, which serves as the starting point for the Action Plan, is valid in Finland as a law. According to the Constitution, public authorities must ensure the realisation of fundamental and human rights. However, the objectives and measures of the Action Plan are not legally binding. Ministries and other authorities are responsible for the implementation of the Convention on the Rights of Persons with Disabilities in accordance with their own areas of responsibility. The ministries have been

closely involved in the preparation of the Action Plan and have been responsible for the entries concerning their own sector. The Action Plan works in line with separately approved government strategies and programmes and as part of their implementation in a separately agreed manner.

The national implementation of the UNCRPD takes place through this Action Plan. This is why the obligation laid down in the Convention on the Rights of Persons with Disabilities to fully involve persons with disabilities and their representative organisations in the entire process must be met in this work. The Advisory Board for the Rights of Persons with Disabilities, which has six representatives appointed by disability organisations, coordinates the work on the Action Plan. The Advisory Board has appointed among its members an action plan working group, which also has included representatives from different disability organisations.

It was also considered advisable to consult disability organisations and stakeholders more extensively to support the preparation of the Action Plan. For this purpose, two hearings were organised for national disability organisations and other stakeholders. At the first hearing, the participants were asked to make observations about the present state and identify the most important issues that the Action Plan should address. Statements were submitted by 22 disability organisations / stakeholders and speeches were given by 18 parties at the event. The second hearing took place as the ministries had to a great extent formulated their objectives and measures. This hearing allowed for commenting on the entries and propose further changes to them. 16 speeches and 18 written submissions were made during the second hearing.

While the Action Plan was under preparation, meetings were held with the ministries which are of key significance to the rights of persons with disabilities. These ministries were the Ministry of Education and Culture (MEC), the Ministry of Justice (MJ), the Ministry of Social Affairs and Health (MSAH), the Ministry of Transport and Communications (MTC), the Ministry of Economic Affairs and Employment (MEAE), the Ministry of the Environment (ME), the Ministry for Foreign Affairs (MFA), the Ministry of the Interior (MI) and the Ministry of Finance (MF). In addition, negotiations were held with the Social Insurance Institution of Finland (Kela). The meetings were attended by VANE's chair and secretary-general, an MSAH senior specialist, members of the working group on the Action Plan, and the public officials in charge of the themes under scrutiny from each ministry.

## 3 Basic principles of Action Plan preparation

### 3.1 Disability policy

#### 3.1.1 Finnish disability policy

The disability policy refers to measures that safeguard and promote the status and rights of persons with disabilities.

The principles of Finland's disability policy are the right of persons with disabilities to:

- equality and non-discrimination
- inclusion in society and decision-making
- right to self-determination
- independent living and
- necessary personalised services and support

The disability policy is based on fundamental and human rights. The non-discrimination of persons with disabilities is enshrined in the Constitution of Finland. According to the Constitution, public authorities must ensure the realisation of fundamental and human rights.

An important objective of the disability policy is the mainstreaming of the rights of persons with disabilities. In accordance with the Convention on the Rights of Persons with Disabilities, persons with disabilities must be involved in decision-making concerning them, and the rights of persons with disabilities must be taken into account in the preparation, decision-making, implementation and monitoring carried out in all administrative branches and levels.

In addition to the Constitution, the UN Convention on the Rights of Persons with Disabilities provides a strong and permanent basis for national disability policy. When preparing the Action Plan, it is also important to take into account international cooperation in the field of persons with disabilities and the documents guiding it, in particular other human rights conventions and strategic documents guiding cooperation, such as the EU Strategy for the rights of persons with disabilities and Nordic Programme for Co-operation on Disability Issues.

### 3.1.2 EU disability policy and EU strategy for the rights of persons with disabilities

The European Union is founded on the values of equality, social justice, freedom, democracy and human rights. The Treaty on the Functioning of the European Union (TFEU) and the Charter of Fundamental Rights of the European Union form the basis for combating all forms of discrimination and set equality the cornerstone of EU policy. The EU promotes the implementation of the rights of persons with disabilities. The European Union and all its member states have ratified the UN Convention on the Rights of Persons with Disabilities. Strengthening the implementation of the Convention is thus a common goal.

The EU Strategy for the rights of persons with disabilities<sup>1</sup> has been published for 2021–2030. The aim of the strategy is to ensure the full participation of persons with disabilities. The key principles of the strategy are equality and non-discrimination.

The strategy is ambitious and broad. The strategy has eight content areas: accessibility, EU citizens' rights, decent quality of life and living independently, equal access and non-discrimination, the promotion of the rights of persons with disabilities globally, effective implementation, leading by example, and awareness, governance and monitoring.

For each content area, initiatives have been defined that either the commission or the member states, or both, work together on to promote the objectives of the strategy. The strategy includes seven flagship initiatives, 57 commission initiatives and 23 action initiatives for member states. The strategy emphasises that implementation requires coordinated cooperation at both national and EU level. The content of the strategy covers the key content areas of the UNCRPD.

Finland is committed to the objectives of the EU disability strategy and its effective implementation. The strategy and its objectives are consistent with Finland's disability policy objectives. The strategy emphasises that achieving its objectives requires commitment not only from member states but also from regional and local authorities. It is appropriate to link the implementation of the strategy to the national Action Plan process and thus ensure its implementation at the national level.

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1 <https://eur.lex.europa.eu/legal-content/EN/TXT/?uri=COM:2021:101:FIN#PP4Contents>

### 3.1.3 Nordic disability policy and Nordic Programme for Co-operation on Disability Issues 2023–2027

Human rights and inclusion are the guiding principles of Nordic cooperation in the disability sector. The Nordic countries strive for sustainable social development based on the individual freedom of those living in the region and the opportunity to realise themselves. The objective of a disability policy is to create a sustainable society in which no one is left behind. The objective is the participation of persons with disabilities in society in all areas. Through their cooperation, the Nordic countries highlight the benefits of an inclusive society and planning that is suitable for all. All Nordic countries are parties to the Convention on the Rights of Persons with Disabilities.

The Nordic disability programme<sup>2</sup> has been published for 2023–2027. The Programme is intersectoral in nature. The priorities of the cooperation programme include human rights, inclusion and free movement. Measures to promote the Programme's objectives over the five-year period have been set for each component. The Programme emphasises the inclusion of children and young persons with disabilities in decision-making.

According to the Programme, the principles of the Nordic welfare society include equal opportunities and equal security for all citizens regardless of gender, ethnic background, religion, belief, functional capacity, age or sexual orientation. On the basis of their social rights, everyone must have equal access to health care, social services, education, culture and working life.

The cooperation programme includes measures to increase accessibility in the labour market, preconditions for exchanging experiences and developing competence, and investments in a stronger voice and participation of children and young people in Nordic cooperation. Nordic cooperation in the disability sector creates synergies and brings depth to other forms and processes of international cooperation.

The objectives and priorities of the cooperation programme are very consistent with the objectives of Finland's disability policy.

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2 <https://www.norden.org/fi/publication/vammaisalan-pohjoismainen-yhteistyohjelma-2023-2027>

## 3.2 Prime Minister Petteri Orpo's Government Programme

The goal of Prime Minister Petteri Orpo's Government Programme, A strong and committed Finland<sup>3</sup>, is that Finland will also survive in a changing and turbulent world. The Government assumes that in a strong and committed Finland, people have the opportunity to increase their competence, find employment, cope with their pay or retirement and live safely. In a society where the basics are in order, people have the right and freedom to pursue a good life that looks like themselves. People have a sense of inclusion and trust in each other. The weakest are taken care of. The role of the Government is to provide a framework for freedom and opportunities.

The Government Programme states that Finland must be able to secure services for people of all ages, from early childhood education and care to education, social and health care services and care, regardless of income level and place of residence. Services and opportunities will also be ensured for future generations. In families, communities and society, people will take responsibility for themselves and each other.

The Government also strives for a role for Finland as a technological pioneer, making full use of the opportunities offered by digitalisation and artificial intelligence, with the participation of people.

The foundation for well-being is a sustainable economy. The government's most important economic policy objective is to achieve sustainable growth. In a strong and committed Finland, entrepreneurship and work are profitable and rewarding. An economically strong Finland is also resilient to crisis.

A strong and committed Finland is an open and international country that works together with other states and nations in European and western value and security communities. The energy transition and clean technologies offer Finland opportunities to create work, export business, economic growth and well-being.

Up-to-date and effective legislation safeguards the stability of society and protects the fundamental rights of individuals. The Government will promote high-quality and knowledge-based impact assessment of legislative drafting and the weighing of regulatory measures.

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3 <https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/165042/Paaministeri-Petteri-Orpon-hallituksen-ohjelma-20062023.pdf?sequence=1&isAllowed=y>

A strong and committed Finland is a stable and reliable country, a strong democracy and an independent state governed by law, in which everyone is valued as an equal member of society. The Government promotes open and well-functioning administration that focuses on continuity and consistent operating methods. Participation and influence are the foundations of a democratic society.

The Government Programme draws attention to many important issues for persons with disabilities. Some of the entries have an indirect impact on persons with disabilities, while others have a very straightforward impact. The Government Programme entries are discussed in more detail in the various content areas, for example in the context of situation descriptions. The Government Programme also has an impact on the objectives and measures set by the ministries for the content areas.

### 3.3 Stakeholder consultations

Hearings were organised for organisations of persons with disabilities and other stakeholders in February and June 2024 to prepare the Action Plan. In addition to their spoken comments, the parties to be heard were asked to submit a written statement on their comment.

The aim of the first hearing, held in February 2024, was to obtain stakeholder comments on issues that should be addressed in the Action Plan on the basis of the situational pictures drawn up. Eighteen parties took the floor in the February event, and a total of 22 parties submitted a statement. The statements issued were taken into account in the preparation of the Action Plan. This chapter contains main observations of these.

Inclusion and participation both in processes related to one's own life and more extensively, for example in the development of legislation, emerged in many statements and speeches. The opportunities for participation and consultation of persons with disabilities and disability councils in different development processes were considered inadequate. There was also a desire for stronger involvement of organisations for persons with disabilities in the monitoring and evaluation of the measures. Many statements called for measures that can be used to promote and support the inclusion of persons with disabilities in both central government and municipal and wellbeing services counties.

Many organisations drew attention to the right of persons with disabilities to self-determination, non-discrimination and equality. In connection with the theme, the need emerged for measures aimed at finding solutions to reduce discrimination. Challenges related to equality and non-discrimination arise in areas such as education, access to services and employment. Supported decision-making was seen as a key way of organising services that increases the inclusion and self-determination of persons with disabilities. Legislation on the right to self-determination should be developed taking the perspective of persons with disabilities into account.

The statements and speeches also highlighted the need to increase awareness and knowledge base. The knowledge base on persons with disabilities was considered incomplete in many respects. For example, the current state of statistical and research data on persons with disabilities cannot be considered sufficient, especially the lack of data on the participation of persons with disabilities in working life and the use of services. In addition to shortcomings in the knowledge base, the inadequate use of information available also emerged. Awareness of the rights of people of different ages and with different disabilities should be raised.

Accessibility was a key theme to which many organisations paid attention. Several opinions highlighted the need to extend the legislation on accessibility. Accessibility should be developed in a determined and systematic manner so that persons with disabilities have access to equal inclusion and participation. More attention should also be paid to accessibility in school and work environments and cultural services. In addition to the physical environment, digital services and their accessibility emerged. Persons with disabilities who need strong support should also be taken into account in the development of digital services.

The organisations also highlighted linguistic rights. The right to receive Swedish-language services was highlighted as an important right. A large number of shortcomings have been observed in the availability of services for persons with disabilities in their mother tongue. The need to increase the availability of sign language and easy read information, among other things, was also seen as an issue to be promoted. The development and harmonisation of interpretation services and their equal availability were also highlighted in statements and speeches. Sámi-speaking persons with disabilities also need services in their mother tongue, and it should be possible to take their cultural special characteristics into account when organising services.

Services for the persons with disabilities and their significance were highlighted in both written and oral statements. In particular, equal availability and accessibility of services, housing services and transportation services were highlighted. In terms of equal availability and accessibility of services, the impact of the wellbeing services county reform and the financial situation of the wellbeing services county on the availability of services emerged. The availability of services provided by wellbeing services counties has been delayed and deficient.

Reasonable accommodations were seen as something that is not sufficiently implemented in the fields of education, the working environment and the cultural environment. A large number of deficiencies and ambiguities regarding reasonable accommodations were perceived in the procedures of authorities and public actors. For example, reasonable accommodations in the school world are poorly known, as is the obligation to implement them.

Adequate standard of living and social security were themes that were discussed in many written and oral statements. The assessment of the impacts of social security changes on persons with disabilities was considered inadequate. In the changes, particular attention should be paid to the perspective of persons with disabilities, safeguarding their adequate livelihood and standard of living.

The right to health and rehabilitation was highlighted in many written and oral statements. Access to health care requiring special expertise was seen as increasingly difficult. Economic austerity measures in wellbeing services counties were considered to have a negative impact on the availability of rehabilitation and assistive device services for persons with disabilities.

In the written and oral statements of the organisations, work and employment were seen as a key right. The employment of persons with disabilities is not implemented equally with others. The opinions highlighted the importance of various support measures to improve the paid employment of persons with disabilities. There have also been many ambiguities with the interpretation services needed in working life, which makes it difficult for persons with disabilities to work and find employment.

Safety and hazardous incidents were a theme that several organisations highlighted in terms of rescue, crisis and preparedness planning and preparedness. There have been many shortcomings in crisis and preparedness planning for persons with disabilities. In the case of persons with disabilities, crisis and contingency planning involves special issues that should be taken into account better already at the

planning stage. In rescue, crisis and preparedness planning, linguistic rights should be better taken into account. The comments also highlighted the consideration of persons with disabilities in emergency communications and the shortcomings in it.

In the second stakeholder consultation in June 2024, stakeholders were asked to comment on the draft Action Plan and the preliminary proposals for targets and measures. At the event, 16 parties spoke and 18 submitted a written statement. Stakeholders focused largely on the same themes in the second consultation as in the first one. The goals of the programme were generally considered to be worthwhile, but the measures were often considered insufficient and progress slow. Several parties were particularly worried about the cuts in social security and the impacts of the cuts on persons with disabilities as well as the consequences of the amendment to the scope of application of the Disability Services Act. The implementation of linguistic rights and security were also emphasised in several statements.

### 3.4 Report on the implementation of the rights of persons with disabilities

In 2023, the Advisory Board for the Rights of Persons with Disabilities (VANE) commissioned a report by the University of Helsinki on the implementation of the human rights of persons with disabilities. The report, “Epävarmuutta ja vaihtelevaa osallisuutta” (“Uncertainty and variable inclusion”)<sup>4</sup>, examines the experiences of persons with disabilities of how their human rights are realised in everyday situations and how they see the rights of persons with disabilities in more general terms. The aim of the report is to supplement statistics and other research data specifically with regard to the experiences of persons with disabilities. In particular, the report was used in the preparation of the conclusion indicators of this Action Plan.

The report was carried out as an online survey supplemented by group interviews. The group interviews aimed to reach people who do not normally participate in online surveys (e.g. deaf persons and immigrants with disabilities) and whose inclusion is subject to a special obligation (children and young persons

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4 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisen henkilön arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

with disabilities). 541 people participated in the online survey and 41 people participated in the interviews. When discussing the results of the survey, it is necessary to take into account the limited number of respondents and, on the other hand, the fact that the survey reached out to persons with disabilities who were able to respond to the survey or participate in the interview and who were reached by means of a questionnaire spread by email. The results of the study complement the situational picture and serve as an important source of information, but the results cannot as such be generalised to apply to all persons with disabilities.

The report found that there were major differences between the respondents in how they felt they were involved and how extensively and often different obstacles affected their everyday lives. On the other hand, a key observation in the report was that the respondents did not feel able to trust that the rights would be realised. Uncertainty and variability were related both to the differences between persons with disabilities and the perceived situational and contextual link between the implementation of rights in the respondents' lives.

The report is itemised by content area of the Action Plan, and the results are specified in more detail in the final result indicators section of each content area. All of the content areas examined were associated with negative experiences, and many questions attracted more negative answers than positive ones. In particular, it was felt that the right to work, a sufficient standard of living and safety were poorly realised. The implementation of rights varyingly reflects the uncertainty and randomness of the implementation of fundamental human rights in the everyday lives of persons with disabilities. Based on the results, the report concludes that in the Finnish society of the 2020s, the citizenship lived by persons with disabilities is determined by the uncertainty and situation-specific nature of the implementation of rights.

## 4 Content areas, snapshots, objectives and measures

This chapter sets out the key requirements of the UN Convention on the Rights of Persons with Disabilities as well as snapshots, objectives and measures related to implementing the Convention in each content area.

The human rights indicators of the UN Office of the High Commissioner for Human Rights have been used to describe the current situation<sup>5</sup>. The indicators were developed to support the evaluation and monitoring of the implementation and promotion of human rights treaties. The human rights indicator guide defines the human rights indicator as: *"...specific information on the state or condition of an object, event, activity or outcome that can be related to human rights norms and standards; that addresses and reflects human rights principles and concerns; and that can be used to assess and monitor the promotion and implementation of human rights."*

The publication highlights the need for quantitative, qualitative, subjective and objective indicators. It is, however, important to be clear about the limitations of their use and the fact that they cannot replace a comprehensive qualitative or legal assessment. The indicator model developed by the UN distinguishes between structural, process and outcome indicators. This makes it possible to describe firstly, the acceptance, intent or commitment to the human rights obligation, the efforts required to make that commitment a reality, and finally the results of those efforts.

In the work on the Action Plan, the model has been applied by putting together a snapshot consisting of three elements. Firstly, the structures that support the realisation of the rights of persons with disabilities are described, including legislation and oversight of legality. The second element describes the process, or the policy measures that promote the rights of persons with disabilities in the administrative branch in question. The third element describes the outcome, or the

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5 Human Rights Indicators: A Guide to Measurement and Implementation; United Nations Human Rights; Office of the High Commissioner; available online at [https://www.ohchr.org/Documents/Publications/Human\\_rights\\_indicators\\_en.pdf](https://www.ohchr.org/Documents/Publications/Human_rights_indicators_en.pdf)

extent to which the rights are realised, based on such information as experiential knowledge and statistics. The section utilises the University of Helsinki's report on the implementation of the human rights of persons with disabilities.<sup>6</sup>

Each ministry has drawn up a description of the current status in its area of responsibility. The first four content areas (inclusion; non-discrimination and equality of persons with disabilities; raising awareness and building the knowledge basis; and accessibility) are cross-cutting themes which must also be taken into consideration in the implementation of the other articles. In addition, this Action Plan addresses the status and rights of women and children with disabilities as special cross-cutting themes.

The objectives were set and the measures selected on the basis of the snapshots produced and the issues raised by disability organisations and stakeholders. The ministries are committed to attaining the objectives and implementing the measures for which they are responsible. The Action Plan assigns responsibility for each measure to a specific party or parties.

## 4.1 Participation of persons with disabilities (Article 4.3 of UNCRPD)

Under the UNCRPD, the States Parties shall consult with and actively involve person with disabilities in decision-making processes concerning them. This mainly takes place through disability organisations. Children with disabilities must also be included in the decision-making that concerns them.

### Structural indicators

Under the Constitution of Finland (731/1999), the authorities must promote the opportunities for an individual to participate in societal activity and to influence the decisions that concern him or her.

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6 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

The Ministry for Foreign Affairs and the Ministry of Social Affairs and Health are the national focal points for implementation of the UNCRPD. The national coordination system, the Advisory Board for the Rights of Persons with Disabilities (VANE), operates in connection with the Ministry of Social Affairs and Health, with key parties for the rights of persons with disabilities represented. VANE has representatives from disability organisations. The Advisory Board appoints a participant from among its members representing persons with disabilities for the activities of the national contact point.

The duties of the independent structure as referred to in the Convention, will be carried out by the Parliamentary Ombudsman, the Human Rights Centre and its Human Rights Delegation which form a National Human Rights Institution. The role of this institution is to promote, protect and monitor the implementation of the Convention.

National disability organisations in Finland have established the Finnish Disability Forum, an umbrella organisation for around 30 disability organisations. In addition, Swedish disability organisations form the association Samarbetsförbundet kring funktionshinder rf (SAMS). Most disability organisations are also members of SOSTE Finnish Federation for Social Affairs and Health, a national umbrella organisation for social and health care organisations. The Funding Centre for Social Welfare and Health Organisations (STEA) supports the majority of member organisations of the Disability Forum financially.

The right of children with disabilities to inclusion in their communities and society has been confirmed in fundamental and human rights regulation. In addition to the UNCRPD, the UN Convention on the Rights of the Child (59–60/1991) obliges states to take measures to strengthen and support children's inclusion.

A National Child Strategy was drawn up in Finland in 2021. One of its objectives is to establish the rights and status of the child consistently in all political and factual activities. This requires strengthening children's participation. The objectives also include securing the status of vulnerable children and better identifying their needs.

In its conclusions to Finland (2011, 2023), the UN Committee on the Rights of the Child has expressed concerns about discrimination against children with disabilities and urged Finland to strengthen its efforts to promote the inclusion of all children, especially vulnerable children.

The purpose of the special legislation on services for persons with disabilities is to promote the ability of persons with disabilities to live and act as equal members of society and to prevent and eliminate disadvantages and obstacles caused by disability (Act on Disability Services and Assistance 380/1987). The purpose of the new disability services act (675/2023, entry into force on 1 January 2025) is to implement the equality, inclusion and participation of persons with disabilities in society and to prevent and remove obstacles to their implementation. In addition, the purpose of the act is to support independent living and the realisation of the right to self-determination as well as to ensure adequate and good-quality services in accordance with individual needs and interests. The act also contains provisions on the participation and services of children with disabilities.

The municipal and regional department of the ministry of finance has supported the inclusion of persons with disabilities by supporting the work of the disability councils in municipalities and the wellbeing services counties that started at the beginning of 2023. There are different practices in wellbeing services counties and municipalities, and the exchange of information and good practices will continue to be needed to ensure that influencing bodies are extensively representative and cooperate well with different organisations. As citizens' panels become more common, it is important that the representation of persons with disabilities is also ensured. Citizens' panels can be used to ensure that the voice of the most vulnerable people is heard and to contribute to the development of services. This is increasingly important in an economically focused atmosphere of discussion.

The Ministry of Justice maintains electronic democracy services, which include [kansalaisaloite.fi](https://kansalaisaloite.fi), [kuntalaisaloite.fi](https://kuntalaisaloite.fi), [otakantaa.fi](https://otakantaa.fi), [digiraati.fi](https://digiraati.fi) and [lausuntopalvelu.fi](https://lausuntopalvelu.fi). The purpose of these services is to improve the transparency of governance and the citizens' opportunities to participate in the preparation of matters and decision-making. These services can be found on the website [demokratia.fi](https://demokratia.fi).

## Process indicators

According to the Government Programme, the self-determination, human rights and equality of persons with disabilities must be respected in decision-making throughout their lives, and the functioning of their daily lives must be ensured in the planning of services. Attention will be paid to ensuring inclusion and hearing persons with disabilities. Legislation on services for persons with disabilities has been and will continue to be reformed. The consultation practices of disability organisations have been extensively implemented and the same approach will continue.

On 23 November 2023, the Government appointed a parliamentary working group to develop practices related to voting and elections. The task of the working group is to examine and implement the following entries in the Government Programme. According to the Government Programme, the Government will ensure the accessibility of polling stations and council halls through legislation and better steering and training of municipalities. Those covered by the transport service are granted the right to travel for voting, and those serving in or running for an elected position are granted the right to a certain number of trips without consuming the right to other travel. The possibility of voting at home will be better communicated.

On 13 November 2023, the Ministry of Justice appointed a cross-administrative working group whose task is to prepare a national programme for promoting democracy and participation, outlined in Prime Minister Petteri Orpo's Government Programme, and to coordinate the implementation of the programme in the Government.

The Ministry of the Interior's corporate strategy network includes a representative of a disability organisation.

When preparing the child strategy, the inclusion of a wide range of children was taken into account in the practical implementation of the inclusion package, and models for promoting inclusion for all children were tested. In the implementation of the strategy, consultations with children and young people were carried out in the preparatory work of ministries. Building permanent models for strengthening children's participation and consultation in central government, municipalities, and wellbeing services counties and broader participation of different groups of children from different backgrounds will be the goal during the government term 2023–2027.

The child strategy has collaborated with the Union of Local Youth Councils in Finland (Nuva). Joint discussions have been held with Nuva and the Vamlas Foundation that supports children and youth with disabilities on the Youth council report 2022 "The youth councils are and can be involved". The study examined how young persons with disabilities, those belonging to neural minorities and people with long-term illnesses are visible in youth council activities. At the same time, the equality and accessibility of youth councils were examined. The Government Programme focuses on the inclusion of young people instead of children. The aim is to promote the inclusion of young people and regional equality by, for example, strengthening the position of youth councils in municipalities and wellbeing services counties.

## Outcome indicators

The inclusion work of the national child strategy ensured the participation of different groups of children, including children with disabilities. The views of children and young people with different types of disabilities emphasised inclusion in “normal everyday life”, the opportunity to spend leisure time at an age-appropriate level, get friends and meet them. They also hoped to be able to feel included. They also felt that their well-being would increase if they were allowed to express their opinions and feel heard.

Children and young people also hoped that their perspectives would be taken into account when making decisions that affect their lives, for example when organising services for the disabled. The individual experience of children and young people should be better taken into account when planning and deciding where, how and by whom different services are organised.

In the opinion of children and young persons with disabilities, adults should have more time for investigating their perspectives and opinions in the future. Children and young people belonging to special groups also hoped to be able to have a wider influence in society.

Summary of the results of the report “Uncertainty and variable inclusion”<sup>7</sup>, Inclusion in decision-making:

*“82 per cent of the respondents to the survey responded that participation in decision-making was poor (implemented poorly/fairly poorly/variably). In open-ended responses, respondents often assessed the realisation of inclusion on the basis of whether participation is possible for them in matters and environments directly related to them. On the other hand, many responses also highlighted views on participation structures and practices more generally. Disability organisations were both praised and criticised in the responses. Especially in the open-ended responses, the impact of the organisations’ activities and the realisation of representativeness were discussed. Respondents highlighted the need to diversify participation by bringing new channels and forums for hearing citizens with disabilities alongside established structures (disability organisations, councils). Strengthening inclusion thus requires comprehensive consideration of*

7 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

*accessibility in the inclusion of citizens at all levels of society. In addition, strong participation of persons with disabilities requires impact from the participation: experiences of so-called pro forma inclusion do not encourage participation but strengthen the experience of marginalised citizenship.”*

## Fostering inclusion and participation: objectives and measures

### **Objective: Ensure the inclusion of persons with disabilities in decision-making concerning them.**

#### **Measure:**

1. Involve persons with disabilities in the different stages of the preparation of legislative and other projects that concern them. Pay particular attention to diverse and accessible ways of participation and enabling early involvement.

*Schedule:* continuous

*Responsible bodies:* all ministries

### **Objective: Promote the inclusion and equality of persons with disabilities.**

#### **Measure:**

2. Take the diversity and intersectional perspective of persons with disabilities into account, i.e., observe the impacts of different factors on the status and rights of persons with disabilities. Pay particular attention to promoting the rights of Roma and Sámi with disabilities.

*Schedule:* continuous

*Responsible bodies:* all ministries

**Objective: Systematically promote the participation of children with disabilities in children's hearings.**

**Measure:**

3. Develop and strengthen the inclusion and consultation of children with disabilities as part of the implementation of the child strategy and the creation of permanent structures for hearing children and young people in central government, municipalities and wellbeing services counties. This requires a broader understanding and support for different communication methods and the development and introduction of methods of consultation and inclusion suitable for the needs of children with disabilities. Work is carried out together with disability organisations and other stakeholders.

*Schedule:* continuous

*Responsible bodies:* National Child Strategy in cooperation with ministries, wellbeing services counties, municipalities and disability organisations

**Objective: Support the activities of advocacy bodies.**

**Measure:**

4. Establish an informal network to improve cooperation between municipalities, wellbeing services counties, municipal residents and organisations. In addition to the authorities, the network would also include representatives of residents and organisations. A particular focus would be on supporting the work of the advocacy bodies, also in relation to councils for older people and councils for persons with disabilities. Despite the tight spending limits situation, the aim is to implement the network as practically as possible and to benefit different areas. The network would also influence the exchange of information in the municipal and wellbeing services county elections in 2025.

*Schedule:* 2024-2025

*Responsible body:* MF

## 4.2 Equality and non-discrimination (Articles 5, 6, 7, 12, 13 and 16 of the UNCRPD)

All persons are equal before and under the law and are entitled without any discrimination to the equal protection and equal benefit of the law. States Parties shall guarantee to persons with disabilities equal and effective legal protection against discrimination. States Parties shall take appropriate measures to provide access by persons with disabilities to the support they may require in exercising their legal capacity. Discrimination on the basis of disability is prohibited. The Convention pays particular attention to the status of children and women with disabilities. They must be entitled to the enjoyment of all rights on an equal basis with others. Persons with disabilities must be protected from all forms of exploitation, violence and battering at home and outside. Support, information and training must be available

### Structural indicators

A person's right to self-determination is extensively protected under Finnish legislation. The Constitution of Finland (731/1999) as well as the social welfare and health care legislation contain several provisions on clients' and patients' right to self-determination. The Constitution guarantees the inviolability of human dignity and the freedom and rights of the individual and promotes justice in society. The Constitution covers the fundamental rights that belong to everyone, including the right to equality, life, personal liberty and integrity, freedom of movement, right to privacy, right to social security and right to one's language.

The purpose of the Non-Discrimination Act (1325/2014) is to foster and safeguard equality and enhance the protection provided by law to those who have been discriminated against. The Act applies to public and private activities, however not those falling within the scope of private affairs, family life or religious practice. The partial reform of the non-discrimination legislation entered into force in June 2023. The reform includes several important improvements for the legal protection of persons with disabilities. For example, the regulation on reasonable accommodation was specified and a reference to a group of people was added to the definition of harassment. With the reform, the Non-Discrimination Ombudsman is competent to deal with individual cases of working life. Promotion and planning of equality expanded to early childhood education and care providers and service providers on a site-specific basis. The education provider's obligation to intervene in known harassment was specified further. In addition, the Non-Discrimination

and Equality Tribunal may recommend that compensation be paid. The matter can be brought to the Non-Discrimination and Equality Tribunal without a designated victim.

The Ministry of Justice is responsible for coordinating the implementation of the Non-Discrimination Act in the government, drafting guidelines and supporting the assessment of equality and equality planning.

The purpose of the Social Welfare Act (1301/2014) is to promote and maintain wellbeing and social security, reduce inequalities and foster inclusion, safeguard adequate social services and other measures of a high quality provided on equal grounds that meet the client's needs and promote wellbeing, and promote a client-centric approach and the client's right to good service and treatment in social welfare.

The Act on the Status and Rights of Patients (785/1992) and the Act on the Status and Rights of Social Welfare Clients (812/2000) promote a client-centric approach and confidentiality of client relationships as well as the right of clients and patients to good service and treatment in social and health care. These acts apply to both public and private social welfare and health care services. The acts contain provisions on taking the client's and patient's interests, preferences and opinions into account as well as on finding out about their wishes, respecting their right to self-determination, and their possibilities to participate and influence the planning and implementation of the services provided for them.

The aim of the Act on Disability Services and Assistance (380/1987) is to promote the prerequisites of persons with disabilities to live and to interact with others as an equal member of society, and to prevent and remove obstacles and disadvantages caused by disability. The new act replacing the current disability services legislation, the Disability Services Act (675/2023), will enter into force on 1 January 2025. Supported decision-making is a new service as laid down in the new act. Its purpose is, among other things, to enable persons with disabilities to make decisions about their own lives. Supported decision-making means, for example, support for obtaining information, investigating options for decision-making or action and forming one's own will. Supported decision-making must be obtained throughout the decision-making process if necessary.

According to the Government Programme, *"The Government will assess the need for legislation obliging municipalities and wellbeing services counties to strengthen the structures for preventing and combating violence."* In connection with the

evaluation, the need for legislation can also be assessed from the perspective of the implementation of the rights of persons with disabilities, taking into account violence against persons with disabilities.

The GREVIO monitoring body of the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) has highlighted the accessibility of women with disabilities and shelters in its recommendations concerning Finland. GREVIO has urged the Finnish authorities to assess how shelters are accessible in practice for women with disabilities. The Finnish Institute for Health and Welfare (THL) has often promoted improvements in the accessibility of shelters.

In its final conclusions of 2022, the body monitoring the implementation of the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) reiterated its recommendations to Finland in 2014 to strengthen the rights of women with disabilities to participate, by recommending measures to facilitate women with disabilities in education, access to the labour market and participation in public and political life, and by reforming sterilisation legislation. In addition, the committee raised the issue of verifying the accessibility of shelters for victims of domestic violence and required the next report to provide details of discrimination against vulnerable groups, including women with disabilities.

## Process indicators

The Ministry of Justice has had an expert group on the monitoring of discrimination, in which the monitoring of discrimination data on persons with disabilities has been an important part of the work. The monitoring of discrimination will continue. In addition, the implementation project of the Non-Discrimination Communication will be implemented in cooperation between the Prime Minister's Office and the Ministry of Justice. The truth and reconciliation process for deaf people and sign language users will be further prepared on the basis of a government working group, and the process will be initiated by the Ministry of Justice. In 2024, a sign language barometer will also be carried out, the purpose of which is to map issues related to linguistic rights and conditions from the perspective of Finnish sign language and Finnish-Swedish sign language.

The Ministry of Justice will carry out projects related to equality and non-discrimination in which disability policy issues are addressed. The Peer Action against Hate project establishes an online centre of excellence for gathering information on hate crime and hate speech. Information is produced in accessible

formats, for example in easy read. The project maintains a network with representatives of disability organisations. The project Well planned strengthens equality planning practices. The training organised by the project deals with disability as a ground for discrimination and reasonable accommodations.

The new legislation on services for the persons with disabilities will enter into force on 1 January 2025. According to the Government Programme, the scope of application of the new Disability Services Act will be specified further, with the purpose of securing the realisation of the rights of persons with disabilities and the availability of services, and ensuring that the Act remains a special act intended for persons with disabilities. The new act is expected to enter into force on 1 January 2025.

The Ministry of Social Affairs and Health is currently working on a self-determination project that will continue to develop legislation on self-determination. The project was launched in 2021 and will be continued during the government term 2023–2027 according to the Government Programme entry of Petteri Orpo's Government: *“Work will continue on drafting legislation on the right to self-determination of clients and patients. The aim is to support and strengthen the right to self-determination and ensure that people's fundamental rights are realised in such a manner that the client's safety and individual needs can be taken into account in all situations. Legislation will be developed in order of legal importance and urgency.”*

To monitor the drafting of legislation, the Ministry of Social Affairs and Health has appointed a broad-based monitoring group to:

1. promote, monitor and support the work on strengthening the client's and patient's right to self-determination, including the preparation of legislation,
2. participate in the assessment of options and proposals and their impacts; and
3. produce expert information and views to support the preparation process.

The first mandate of the monitoring group ended at the end of 2023. The Ministry of Social Affairs and Health will appoint a monitoring group for the next term (2024–2026). The monitoring group for the project on the right to self-determination is represented by the Finnish Disability Forum and Inclusion Finland KVTL, and the permanent expert is the secretary-general of VANE.

The purpose of the self-determination project is to ensure that the legislation related to the client's and patient's right to self-determination and its implementation comply primarily with the requirements laid down in the Constitution and human rights treaties in social welfare and health care services where such regulation is completely missing. The current legislation does not meet the requirements that the restriction of fundamental rights must be based on law and that restrictions must be strict and sufficiently precise.

The preparation will take into account international human rights conventions, constitutional requirements and reports drawn up by the Ministry of Social Affairs and Health on the right to self-determination, as well as initiatives submitted to the Ministry of Social Affairs and Health. Due to the considerable backlog in preparation, the project will be staggered according to the legal urgency and priority.

In the Ministry of the Interior, a functional working group on equality and non-discrimination is responsible for promoting equality and monitoring the achievement of the objectives set. The intention is to re-establish the working group from the beginning of 2024. The ministry's equality and non-discrimination plan for 2022–2025 was adopted in 2022. The plan emphasises, among other things, the preservation of multi-channel services and accessibility of services. In addition, one of the priorities of the plan is to increase the participation of persons with disabilities, and also other groups at risk of discrimination, in the preparation of matters. The plan also draws attention to increasing safety communications in easy read and sign language.

With regard to the Border Guard, the Equality and Non-Discrimination Plan 2024–2025 will include the entry "determine the prerequisites for offering employment opportunities to persons with partial work ability outside the Border Guard", which would thus also apply to persons with disabilities.

The Action Plan for Equality and Non-Discrimination in Rescue Services (published in 2021) contains long-term objectives for promoting equality and non-discrimination in the rescue sector. One of the objectives is: Develop working conditions, pay and recruitment practices to be more equal and non-discriminating, increase the number of persons with disabilities and persons with partial work ability in rescue sector personnel, and strengthen the status of sexual and gender minorities. As a measure to achieve the goal: Measures to develop equality and non-discrimination, such as anonymous recruitment practices, must be introduced in the recruitment processes of rescue sector organisations and, where possible, the use of positive special treatment should be considered. Investments will be

made in the recruitment of persons with partial work ability and persons with disabilities. The measures must be described in the organisation's equality and non-discrimination plan.

Petteri Orpo's Government Programme contains several entries related to the prevention of violence. However, these do not explicitly mention persons with disabilities.

The working group of the committee for combating violence against women and domestic violence (NAPE) is represented by the women's network of disability organisations from the Finnish Association of People with Physical Disabilities. In 2023, NAPE and THL organised a webinar on violence against persons with disabilities.

In recent years, shelters for victims of domestic violence have undergone several measures to improve the accessibility of the service. On the one hand, concrete improvements have been made to the shelters' facilities (including the renovation of facilities to make them accessible) and, on the other hand, information on shelter services has been increased for persons with disabilities and social welfare and health care professionals. In addition, shelter workers have been trained on persons with disabilities as victims of domestic violence. Shelters have had the opportunity to apply for discretionary government transfers for accessibility renovations.

Since 2021, the Nollalinja helpline intended for victims of violence and their family and friends has had a chat service that enables or facilitates the use of the service by persons with disabilities.

## Outcome indicators

In 2022, the Finnish Institute for Health and Welfare conducted the VN TEAS report on domestic violence experienced by persons with disabilities. The report also collected survey and interview data from persons with disabilities. According to the report, persons with disabilities, especially women and girls, have experiences of domestic violence more often than the rest of the population. According to the report, a lot of assistance was received for violence against persons with disabilities from organisations and, to a lesser extent, from the public service system. Experienced violence is often not reported at all, and one reason for not reporting violence was that the respondents felt that no one believed in the violence they had experienced. Talking past the person and listening to an assistant or a professional instead of the person with a disability were also brought up,

which may indicate structural disablism and a belittling attitude toward disabled persons. In order to prevent violence against persons with disabilities and especially against girls and women, to influence the attitudes of professionals, and to identify violence, there would be a need for education and network cooperation.

Based on the above-mentioned VN TEAS report, persons with disabilities experience many types of violence in their close relationships (including assistants) and it is more difficult for them to seek help with the violence they experience. There may also be different forms of abuse or neglect of care. In order to promote equality, to identify and prevent bullying, discrimination, abuse and violence against persons with disabilities, and to improve access to assistance, etc., training and resources for different professionals would be necessary. In addition, in order to identify violence, teaching persons with disabilities about their own personal limits and safety skills from childhood to adulthood must be ensured with the help of accessible materials. With regard to existing tools for identifying violence, it should be noted that they are also suitable for persons with disabilities.

Summary of the results of the report "Uncertainty and variable inclusion"<sup>8</sup>,  
Non-discrimination and equality:

*"Based on the results of the surveys, the non-discrimination and equality of persons with disabilities are poorly realised in Finland. 75% of the respondents had experienced discrimination in the past 12 months. Discrimination experienced in one in four cases had been continuous (at least monthly). In addition, more than 80% of the respondents estimated that both the equality of persons with disabilities and the rights of children and women with disabilities were poorly realised (poorly/fairly poorly/variably). According to the report, due to negative attitudes towards disability, the full equality of persons with disabilities is not realised and persons with disabilities face continuous discrimination in their everyday lives. There is a lack of awareness of the rights of persons with disabilities, especially in situations where discrimination is encountered. Instead of experiences of non-discrimination and equality, experiences of structural, systematic and biased inequalities played a key role in the responses."*

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8 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

## Fostering equality: objectives and measures

### **Objective: Assess the impact of projects on the rights of persons with disabilities.**

#### **Measure:**

5. Assess the impacts of legislative and other projects affecting the realisation of the rights of persons with disabilities on the rights of persons with disabilities. Pay particular attention to the obligations of the UNCRPD in the impact assessment. In addition, pay attention to the combined impacts of different projects.

*Schedule:* continuous

*Responsible bodies:* all ministries

### **Objective: The partial reform of the non-discrimination act legislation will be assessed in accordance with the Parliament's statement.**

#### **Measure:**

6. In the assessment of the Non-Discrimination Ombudsman's working life mandate, examine the implementation of the rights of persons with disabilities in particular.

*Schedule:* during the Action Plan period

*Responsible body:* MJ

### **Objective: Implement the truth and reconciliation process for deaf and sign language speakers in cooperation with the sign language community.**

#### **Measure:**

7. The state truth and reconciliation process for deaf and sign language speakers begins.

*Schedule:* during the Action Plan period/ongoing

*Responsible body:* MJ

**Objective: Develop a good discussion culture.**

**Measure:**

8. Set up a network for coordinating a good discussion culture, taking into account speech related to persons with disabilities.

*Schedule:* 2024-2027

*Responsible bodies:* MJ, MI, National Police Board, Police University College, Traficom

**Objective: Persons with disabilities experiencing or threatened by domestic violence receive help from shelter services.**

**Measures:**

9. Increasing the knowledge of shelter staff and other social welfare and health care professionals on persons with disabilities as victims of domestic violence and on the right of persons with disabilities to use shelter services.
10. Improving the accessibility of shelter facilities and promoting reasonable accommodations at shelters.

*Schedule:* continuous

*Responsible body:* THL in cooperation with shelters for victims of domestic violence

**Objective: Promote the right of persons with disabilities to self-determination.**

**Measure:**

11. Continue the work on the legislation on the right to self-determination of clients and patients in order of legal importance and urgency. Ensure that the rights of persons with disabilities are taken into account and that they are included in preparations.

*Schedule:* during the Action Plan period and in further preparation

*Responsible body:* MSAH

### 4.3 Raising awareness and building a knowledge base (Articles 8 and 31 of the UNCRPD)

Awareness of the rights of persons with disabilities must be raised, and stereotypes, prejudices and harmful practices relating to persons with disabilities must be combated. Statistical and research data must be collected to implement the Convention.

#### Structural indicators

While raising awareness of disability in society and among persons with disabilities is a cross-administrative task, the mechanisms referred to in Article 33 of the UNCRPD have a particular obligation to promote this objective. Disability organisations also play an important role in raising awareness.

The website of the Advisory Board for the Rights of Persons with Disabilities VANE ([vane.to](http://vane.to)) provides information on the UN Convention on the Rights of Persons with Disabilities in different languages. In addition to Finnish and Swedish, the introductory texts of the site are provided in Finnish and Finnish Swedish sign languages, the three Sámi languages spoken in Finland, and in easy read Finnish and Swedish. VANE has also produced the entire text of the Convention in sign language, in easy read Finnish, in braille and as an audio file.

Several authorities in Finland have an obligation to collect data on different issues concerning persons with disabilities (including Statistics Finland, Kela, and the Finnish Institute for Health and Welfare). In addition, different authorities, organisations, service providers and researchers collect and/or use data. There are also some statutory registers in Finland, such as the Finnish Register of Visual Impairment. Population studies are used to monitor the health and well-being of the population.

#### Process indicators

The Finnish Institute for Health and Welfare maintains an online Handbook on services for persons with disabilities. The contents of the handbook are published not only in Finnish and Swedish, but also, where applicable, in Sámi and English. The handbook is intended to support the work of professionals of services for

persons with disabilities, but the contents are also used by many other target groups. The handbook serves as an important platform for disseminating information on the disability sector.

In addition to the Handbook on services for persons with disabilities, THL organises a number of different events aimed at disseminating information and awareness of disability and services for persons with disabilities. The annual disability services conference is the largest event in the disability services sector, and it brings together experts, professionals, authorities, NGOs and customers. Each month, THL together with Hyvinvointialueyhtiö Hyvil Oy organises online event called Networking services for persons with disabilities. These events are intended for all persons interested in services for the persons with disabilities, especially professionals and organisations. In addition to a varying topical theme, the event programme includes a word from Hyvinvointialueyhtiö Hyvil Oy and the Finnish Institute for Health and Welfare as well as topical issues of the Ministry of Social Affairs and Health.

The social welfare monitoring register is a social welfare data monitoring tool launched by the Finnish Institute for Health and Welfare in 2023. Initially, key customer and service data from social welfare services will be collected in the register, which will later expand to cover extensive information describing the need for services and service processes. Information is collected to improve social welfare services. The authorities use the social welfare monitoring register in the evaluation, guidance and supervision of social services. The wellbeing services counties use the monitoring register to support their knowledge management. In the target state, numerous separate social welfare data collections can be discontinued, and similar data can be obtained from the social welfare client data archive.

First, information on social welfare client relationships will be collected in the social welfare monitoring register. Data collection will expand as structural storage of social welfare client data becomes more common. Recording and archiving of structured data will be mandatory during the transition period from 1 September 2024 to 1 September 2026. Services for persons with disabilities will be required to join Kanta at the end of 2025. The current estimate is that the monitoring data obtained from the monitoring register will be comprehensive and reliable for disability services in 2027.

The structured documentation accumulated in the social welfare client data archive will already be used for secondary purposes during the transition period, for example in research and development. In the next few years, the structured archiving of documents will multiply the data contents of the monitoring register.

For example, differences in service processes or the impact of service needs on the implementation of services can be examined. In the early stages of the monitoring register, customer data is only available at the service task level, i.e., how many customers there are in the services for the disabled.

The social services' operational statistics is a separate data collection that supplements data collection from registers. A significant part of the current knowledge base of services for persons with disabilities is based on operational statistics. The Finnish Institute for Health and Welfare has collected the data since 2015. Before this, Statistics Finland carried out the data collection. The operational statistics provide information on the number of clients in social services by region and, for example, for some services for persons with disabilities, also by age group.

The data is collected from the wellbeing services counties each statistical year in January–February. The wellbeing services counties use the statistical searches carried out by client and patient information system suppliers, the results of which the wellbeing services counties enter on THL's online form. As before the health and social services reform, an effort will also be made to collect data for each municipality in addition to the wellbeing services county level. However, this has proved challenging, and the quality of information in municipal-level examinations is weaker and deficiencies are greater than before. The data is collected only at the summary level – in other words, no unique information on customers, such as a personal identity code, is transferred to THL in the submission of data. This means that the data of service users cannot be combined with other sources of information, such as Kela's registers for research or knowledge management purposes.

The Terve Suomi (Healthy Finland) population survey is used to monitor the well-being and health of the population and the changes in these in different population groups and regions. As the only population survey, the study provides monitoring and assessment data on satisfying the population's needs for services and on the population's views on the social and health care service system, the availability of services, their quality and use. The Terve Suomi survey is the only extensive population survey that contains questions related to social services.

Terve Suomi produces an important part of the data needed for the monitoring and evaluation of wellbeing services counties, enabling comparisons between the counties and comparisons in relation to the situation in the whole country. Healthy Finland answers questions concerning the perceived well-being of the population, the need for services and the use of services to which other data and registers do not currently produce information.

Population surveys provide information on the health, well-being, living conditions and use of services by persons with disabilities, using the so-called Washington Group Short Set questions. The purpose of the questions is to identify persons with a functional disability. By isolating this group from the general population, it is possible to examine the health, well-being, living conditions and use of services in relation to the rest of the population. At the moment, however, sampling by wellbeing services county is too small for the situation of persons with disabilities to be examined by region. However, this is possible at the national level.

As with other public social welfare and health care services, the cost data of disability services is based on the financial data repository maintained by the State Treasury, to which the wellbeing services counties report their financial data in a specified format. The cost data of disability services are based on the reporting according to the so-called AURA service categories and on THL's so-called HHYTT separate data collections. In the AURA classification, social services for persons with disabilities are their own summary level, and cost information on separate services is also available at the service class level. The AURA classification and its reporting guidelines will be revised in early 2024 to better meet the services and monitoring needs of the reforming legislation at the beginning of 2025. In addition to the AURA classification, THL proposes that data collection from wellbeing services counties on separate data needs (HHYTT) be carried out, especially for completely new services.

In addition to the constantly updating statistical and register data base, the Finnish Institute for Health and Welfare occasionally conducts various separate studies related to the information interests and needs of each time. An example of this is the Services for the Persons with Disabilities 2022 report, published in 2023, which describes the state of services for the disabled from the perspective of the service provider in 2022, just before the transition to a new social welfare and health care structure. The report was based on two separate surveys, the first of which was directed at providers of services for persons with disabilities in municipalities and joint municipal authorities and the second at social workers in services for persons with disabilities.

As the legislation on services for the persons with disabilities will be reformed at the beginning of 2025, it is important to determine the needs for monitoring the legislation. For example, it is important to obtain reliable information on the new services of the legislation and their implementation as well as the satisfaction of the service needs of persons with disabilities and the realisation of their rights, so that the realisation of the objectives of the legislation can be assessed. THL, together

with the MSAH, will examine the needs and objectives of the monitoring of the reforming legislation in 2024, on the basis of which it will plan the structure and implementation of the monitoring.

Rare diseases constitute a significant group of 7,000 different diseases. It is estimated that the number of people with a rare disease in Finland is over 300,000, and a significant proportion of this population group is persons with disabilities. THL was given the national coordination of rare diseases as a new task in 2021, and as a result of the coordination, knowledge and awareness of rare diseases have increased considerably. As a result of the coordination and cooperation with service providers, a separate diagnosis classification intended for rare diseases, the so-called ORPHA codes, will be introduced in the patient and client information systems of social welfare and health care. The new classification will provide better information on rare diseases, people with a rare disease and their need for and use of services. This makes it possible to develop the service system, improve the status of people with a rare disease and increase their participation. In January 2024, the third national programme for rare diseases was published for the period 2024–2028, and one of its priorities is the building of registers and a knowledge base as well as the sharing of information.

## Outcome indicators

The internal security report for 2021 included a survey on security targeted at vulnerable people, including those with visual and hearing impairments.

Summary of the results of the report “Uncertainty and variable inclusion”<sup>9</sup>, Awareness and increase of knowledge:

*“Based on the results of the study, it can be concluded that the increase in awareness and knowledge base is not considered sufficient during the past period. 87% of the respondents rate the awareness of different actors poor while 74% give that rating to the availability of information (scale: poor/fairly poor/variable).”*

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9 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

## Raising awareness and complementing the knowledge base: objectives and measures

**Objective: The reform of the Disability Services Act strengthens the knowledge and awareness of service providers and producers as well as other actors about the new act, its services and its application.**

**Measure:**

12. Support wellbeing services counties and other actors in the application of legislation by maintaining the Handbook on services for persons with disabilities administered by the Finnish Institute for Health and Welfare. In addition, continue the organisation of THL's Networking services for persons with disabilities and other cooperation and development activities with various parties.

*Schedule:* during the Action Plan period

*Responsible body:* Finnish Institute for Health and Welfare

**Objective: Develop and strengthen the knowledge base related to disability.**

**Measure:**

13. Organise a cross-administrative discussion event to develop statistics and the knowledge base.

*Schedule:* during the Action Plan period

*Responsible bodies:* THL in cooperation with MSAH and VANE

**Objective: Introduce indicators describing the employment of persons with disabilities.**

**Measure:**

14. Statistics Finland collected statistical data on the employment of persons with partial work ability and persons with disabilities in 2022 for the first time. Data is collected every two years. The MEAE will start using the statistical data to monitor the employment trends of persons with disabilities and persons with partial work ability.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

## 4.4 Accessibility and access to information (Articles 9 and 21 of the UNCRPD)

Persons with disabilities must be ensured equal access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and rural areas.

Persons with disabilities must have the right to the freedom of expression and opinion, including the freedom to seek, receive and impart information and ideas through all forms of communication of their choice. Private entities and the mass media must be urged to provide information and services in accessible formats for persons with disabilities.

Information intended for the general public must be provided to persons with disabilities in an accessible format without additional costs. The modes and formats of communication used by persons with disabilities, including sign languages, Braille, augmentative and alternative communication must be facilitated in official interactions and information provision.

## Structural indicators

Accessibility is taken into account as a general viewpoint in the current Land Use and Building Act (132/1999) in land use planning (section 5), the objectives of building guidance (section 12) and the requirements concerning construction (section 117).

The Government Decree on the Accessibility of buildings (241/2017) adds detail to the obligations laid down in the Land Use and Building Act (132/1999). The purpose of the minimum accessibility requirements for buildings is to promote equality between people: everyone's possibility to participate in society, use services, work, choose their place of residence and live in their home. The obligations of the Accessibility Decree apply to a building and its plot or building site.

Provisions on operating safety requirements essential for accessibility, such as handrails and lighting, are also laid down in the Ministry of the Environment decree on the safety of the use of buildings (1007/2017).

In addition to what is provided in the current Land Use and Building Act (132/1999), no provisions on obligations regarding accessibility in public areas are laid down in any decree. In addition, the accessibility decree's obligations only apply to new buildings and buildings subject to a permit. Taking accessibility into account is part of methodical property management, however, even if no measures requiring a building permit are pending.

On 1 March 2023, the Parliament adopted the Construction Act, which comprehensively incorporates the fight against climate change into the legislation on construction. The aim of the Act is also to streamline construction and improve the quality of construction by clarifying responsibilities. There will be no changes to the obligations related to the implementation of accessibility, but the concepts have been specified. The current building and action permits will be replaced by one form of permit, and the threshold for building projects requiring a permit will be increased. The Construction Act will enter into force on 1 January 2025. At the same time, the title of the Land Use and Building Act will be changed to the Land Use Act in accordance with its contents.

The Ministry of the Environment has published a guideline related to the Accessibility Decree which sets out the provisions of the Decree and recommendations related to their application. In addition, the Ministry of the Environment has published a planning guide titled The accessible building and environment.

In addition to regulation and knowledge-based management, financial support and grants are an important means of promoting accessibility. The Act on Renovation Grants for Residential Buildings and Apartments (1087/2016) contains provisions on grants disbursed from central government funds for retrofitting lifts and removing barriers to mobility in residential buildings and for renovating housing units for older persons and persons with disabilities, allowing them to continue living at home. These grants are available from the Housing Finance and Development Centre of Finland (ARA).

The grants are used to make a residential building and the units or other facilities located in it accessible to a person with restricted mobility or functional disability. Ara also disburses grants for renovating the homes of low-income older persons and persons with disabilities. The Government has issued a decree on renovation grants for residential buildings and dwellings (1373/2016), under which a grant may be disbursed for a measure carried out in a dwelling if at least one member of the household permanently living in it is aged 65 or over or, due to a disability or illness, has particular long-standing difficulties in coping with normal daily activities.

The new Disability Services Act (675/2023) will enter into force on 1 January 2025. According to the Act, persons with disabilities have the right to receive reasonable support for accessible housing if they need it in order to be able to live in their permanent dwelling.

The wellbeing services county must provide support for accessible housing with respect to:

1. modifications;
2. removal of obstacles from the immediate vicinity of the dwelling;
3. tools and other technical solutions enabling accessible living;
4. the planning of accessible housing.

The wellbeing services county may also provide tools and other technical solutions free of charge to persons with disabilities.

The Non-Discrimination Act (1325/2014) obliges authorities, education providers, employers and suppliers of goods or services to promote accessibility and requires them to make reasonable accommodations and to be prepared for the most common situations requiring accommodations. However, reasonable accommodations only refer to changes which are made if necessary and on a case-by-case basis if they do not cause an unreasonable inconvenience and if they ensure the equality of persons with disabilities with others.

Section 4 of the Off-road Traffic Act (1710/1995) contains a provision on the right of persons with severe physical disabilities and persons accompanying them to drive a motor vehicle off the road without the landowner's or holder's permission. The purpose of this exception to the basic rule has been to ensure that persons with disabilities can have access to recreation in a natural environment, for example on a quad or a snowmobile.

In 2015, the European Commission issued a proposal for a Directive of the European Parliament and of the Council on the accessibility requirements for products and services (the European Accessibility Act). The proposal was adopted in spring 2019. In Finland, the directive has been implemented by the Act on Accessibility Requirements for Certain Products (102/2023) and by amendments to certain other acts. Accessibility requirements based on the directive must be applied since 28 June 2025.

The Accessibility Act contains Annex III, which also sets out accessibility requirements for the built environment of products and services covered by the directive. The integration of the accessibility requirements of Annex III into national law is at the discretion of the member states. However, in its reports, the commission is obliged to monitor whether the application of the directive has brought about convergence of accessibility requirements for the built environment of services in the member states. In Finland, Annex III of the Accessibility Act has not been implemented. However, during the implementation phase of the directive, it was considered problematic that accessible services could be placed in a non-accessible environment. In its report, the Parliament's commerce committee stated that the work on the built environment will continue as a separate project and in cooperation with various stakeholders.

The accessibility requirements also include taking linguistic rights into account. Section 17 of the Constitution of Finland (731/1999) contains a provision on the right to one's language and culture. Under the Constitution, the national languages of Finland are Finnish and Swedish. The right of everyone to use his or her own language, either Finnish or Swedish, before courts of law and other authorities, and to receive official documents in that language, shall be guaranteed by an act. The public authorities shall provide for the cultural and societal needs of the Finnish-speaking and Swedish-speaking populations of the country on an equal basis. Under the Constitution of Finland, the rights of persons using sign language and of persons in need of interpretation or translation aid owing to disability shall be guaranteed by an act (section 17(3)).

The legislation in different administrative branches lays down provisions on linguistic rights, including the right to interpretation. For instance, the Act on Interpretation Services for Persons with Disabilities (133/2010) contains provisions on the right of a person with disabilities living in Finland to an interpretation service arranged by Kela. The purpose of the Sign Language Act (359/2015) is to promote the linguistic rights of sign language users. Under the Sign Language Act, the authorities must promote in their activities the opportunities of sign language users to use their own language and obtain information in their own language. Under the Administrative Procedure Act (434/2003), the authorities must use language that is clear, easy to understand and to the point.

The Act on the Provision of Digital Services implements the requirements concerning the provision of digital services and compliance monitoring in the Web Accessibility Directive and the Accessibility Directive. The requirements apply, for example, to the accessibility of services. The act was last updated with the requirements arising from the Accessibility Directive, and a proposal is currently being prepared to centralise the supervisory tasks concerning digital services, arising from the Web Accessibility Directive and the Accessibility Directive, to a single authority. The task of the supervisory authority is to prepare the supervision to be carried out at the time together with organisations for the disabled.

Kela maintains regular contacts with key customer organisations related to the interpretation service for persons with disabilities. Approximately four times a year, a cooperation network for interpreting services for persons with disabilities meets under the leadership of Kela, representing organisations in the fields of hearing, visual and speech impairments and the MSAH. Kela also participates in the Advisory Board on persons with a speech disability, which meets approximately three times a year. In addition, customer organisations are contacted as necessary on the basis of emerging questions and proposals.

## Process indicators

Prime Minister Petteri Orpo's Government Programme states that the Government will draft a Land Use Act with the aim of promoting, among other things, a good living environment. One measure is also to ensure the compatibility of legislation on land use and construction. In addition, the Government Programme includes the revision of the Construction Act and lightening of building regulations as well as updating maintenance legislation to meet today's needs. The Ministry of the

Environment has appointed working groups to prepare the reform of the Land Use Act and the implementation of plans and the reform of legislation on the maintenance of streets and certain public areas.

The Ministry of the Environment promotes recreational use of nature through its activities. The National Nature Recreation Strategy 2030<sup>10</sup> highlights equal and barrier-free accessibility of nearby nature as one of the main objectives. The strategy was prepared in a cross-administrative manner under the leadership of the Ministry of the Environment and was issued as a Government resolution in May 2022. The strategy's Action Plan<sup>11</sup> was completed in November 2023.

At the end of 2022, the Ministry of the Environment appointed a working group to form a situational picture of the accessibility of the built environment and to make proposals for developing legislation and other measures. The working group highlighted strengthening human rights-based accessibility, pre-enforcement of accessibility, development of accessibility as a whole, and development of facilities and services open to the public and promotion of accessibility awareness.

In the administrative branch of the Ministry of the Interior, the construction of new fire stations ensures accessibility and pays attention to accessibility. In the accessibility of websites and safety communications, the obligations will be taken into account when developing e-services and materials, for example. The effectiveness objectives of the Action Plan for incident prevention in the rescue services include that electronic services should cover all population groups by 2024.

The aim of Finland's Management strategy for state properties and facilities located abroad 2019–2030 is to ensure that the premises are safe and healthy. On these grounds, the accessibility of the facilities plays an important role from the perspective of both the employees and customers of the Ministry for Foreign Affairs. Efforts have been made to bring accessibility to the level required in Finland, taking the accessibility requirements of the host country authorities and any local fire safety and building protection requirements into account. These requirements are always reconciled on a case-by-case basis, and the workers and customers of the office buildings are informed of any shortcomings in accessibility, such as the availability of accessible toilets on an upper floor of the office building, and the solutions that compensate for them.

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10 <https://julkaisut.valtioneuvosto.fi/handle/10024/164145>

11 <https://julkaisut.valtioneuvosto.fi/handle/10024/165226>

The aim of the Ministry for Foreign Affairs' property services unit is to, together with the foreign missions, to produce a centralised examination of the accessibility situation of all premises and to assess the need to add this information to the missions' websites to inform their customers.

According to the Government Programme, the implementation of the rights of persons with disabilities and older people will be strengthened during the government term and their opportunities to participate in a digitalising society will be supported. The Ministry of Finance is launching a project to promote the primacy of digital services, which, if implemented, will also promote the opportunities of persons with disabilities to use digital service channels independently. The promotion of digital equality also requires close cooperation in the development of digital support services (e.g. Digital identification and authorisation) and in ensuring the accessibility of services and products.

According to the Government Programme, the limitation of the right to long-term interpretation services to three years will be examined during the government term, except in special cases, such as for persons with disabilities. The Ministry of Justice's communication aims for an increasingly clear and comprehensible language, for example, through a tone survey of online communication. The sign-language contents of the ministry's website will be updated and expanded in 2023–2024. Content in easy read is also produced on topics other than elections. In 2025, the Ministry of Justice will prepare a new language report.

One of the objectives of the Strategy for the National Languages of Finland is to take the need for easy read into account as part of accessibility. As a related measure, the strategy specifies that the use of easy read Finnish and easy read Swedish will be increased in ministries' and administrative branches' activities, communications and event planning, as will be done with competence related to the use of easy read and clear general language. Furthermore, visual expression is used in addition to verbal expression. All ministries are responsible for the measure.

In order to secure the service for customers who used the text phone service in the past, the working group on the future of the text phone service set up by the Ministry of Social Affairs and Health has examined the impacts of the termination of the text telephone service on customers using the service. At the proposal of the working group, Kela launched an experiment on 7 November 2023 for customers using a print interpretation service. The trial will last about six months, and the aim is to examine how text interpretation is suitable for short-term use in remote services.

## Outcome indicators

In their current form, the Accessibility Decree and the Non-Discrimination Act are not adequate to meet all the UNCRPD requirements regarding accessibility in the built environment. Reasonable accommodations are not intended to replace basic accessibility solutions, and the Accessibility Decree only applies to construction projects subject to a permit, and thus only a part of the built environment.

The UNCRPD and the Accessibility Decree contribute to promoting the status and rights of persons with disabilities. Nevertheless, the Non-Discrimination Ombudsman stated in her government programme recommendations for 2023–2027 that inaccessibility in the existing built environment remains a significant problem in Finland. The ombudsman has recommended extending the accessibility legislation to existing facilities for the public and to general areas, and to include an obligation to implement easy accessibility corrections in the legislation.

The Government Decree on the Accessibility of buildings is inevitably general in nature, and the minimum requirements do not always guarantee equal access for all users. While basic solutions for accessible mobility are implemented in new buildings, room for improvement remains in the accessibility of the visual and audio environment.

The practical application of the Accessibility Decree depends on municipal building supervision authorities. They must have expertise related to the significance of accessibility and understand the impacts of its application in practice. In some municipalities, the Disability Council is asked to give a statement on accessibility in connection with the building permit process of significant projects.

The current housing stock in Finland continues to be rather inaccessible. As the population ages, the need for accessible housing will increase further. There is a need to provide more accessible housing, not merely in new buildings but also through repairs. In this respect, government grants for home renovations are important. Renovation advice is also needed.

An estimate based on the buildings' construction year indicates that approximately 23% of the current units (700,000 dwellings) are accessible. One of the greatest challenges in old blocks of flats is that they have no lifts, or the lifts are very small. A study completed in 2016 looked at what type of information is available on the location of buildings that have and do not have lifts and where this information can be found. According to Statistics Finland's Dwelling Stock 2020, 2,200 of the

over three-storey apartment blocks in total were without a lift in 2020. There were some 64,000 dwellings and 85,000 inhabitants in them. Only 24% of three-storey buildings had a lift. 362,000 Finns lived in three-storey buildings without a lift.

Nevertheless, shortcomings continue to affect the realisation of linguistic rights. For instance, while the authorities must promote the opportunities of sign language users for using and obtaining information in their language, this is not always achieved in practice.

The success of the interpretation service for persons with disabilities is monitored regularly at Kela, for example by utilising statistical data. Statistics are used to monitor, among other things, the number of clients using different types of interpretation, the availability of interpretation at the national and regional levels and by interpretation product, the success rate of mediation work, and so on. In addition, the number and content of appeals and complaints as well as the development needs based on them are monitored. The service is continuously developed taking into account the views and needs of customers and stakeholders.

Kela collects customer feedback directly from customers and also receives feedback through customer organisations. Regular dialogue has been carried out with the Finnish association for the deaf, among others, and experts by experience have also been involved. The service providers' agreement includes collecting customer feedback and providing Kela with summaries of the feedback. The market dialogue during the procurement planning phase also involves a customer survey, which is used to survey the customers' views on the organisation of the service. Equality issues have recently emerged both between customers and in relation to persons without disabilities.

The supervisory authority (regional state administrative agency for Southern Finland) engages in an active dialogue with various NGOs on the state of accessibility of digital services.

Summary of the results of the report "Uncertainty and variable inclusion"<sup>12</sup>,  
Accessibility:

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12 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

*“The challenges related to accessibility affect the lives of many persons with disabilities comprehensively in all areas of life. It is felt that challenges are particularly common in public spaces (excluding work or study places) and in traffic, as well as in information and communication. In daily life, 64% of the respondents feel that the accessibility of public spaces is poor (poorly/fairly poor/variable), 70% rate public transport and mobility in the same way, while 64% rate communication in this way. The right to use the mode of communication chosen by them in official interaction is also estimated to be poorly implemented (85% poorly/fairly poorly/variably). The results emphasise the variability of accessibility in particular.”*

## Fostering accessibility and access to information: measures and objectives

### **Objective: Promote accessibility in the ministries’ activities and premises.**

#### **Measure:**

15. Pay particular attention to accessibility in all ministries’ activities and facilities and the related training needs. Ensure that communication is accessible. Pay special attention to the accessibility of the events to be organised.

*Schedule:* continuous

*Responsible bodies:* all ministries

**Objective: Create preconditions for integrating accessibility into different information system projects and logical data models.**

**Measures:**

16. Implement a logical data model on the information components of the accessibility decree and offer it as part of a semantically interoperable and harmonised concept.
17. Maintain a terminological accessibility vocabulary of the built environment. Continue to consolidate the use of uniform conceptual definitions.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Promote suitable planning and accessibility of the building stock and the surrounding environment in new and renovation construction and as part of systematic property maintenance through information management and development activities. Support the work of building supervision authorities to ensure that they can exert influence through knowledge-based management.**

**Measures:**

18. Participating in the organisation of training events on accessibility and the Accessibility Decree through cooperation networks. Highlight the importance of accessible construction as a communicated message.
19. Produce a report on design suitable for all in the built environment.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Monitor the UNCRPD implementation in the enforcement of the accessibility decree. Take the different areas of accessibility into account in the development of accessibility legislation.**

**Measures:**

20. Carry out a functionality assessment of the accessibility decree and investigate in connection with it what development needs exist to ensure accessibility in the planning and building permit process.
21. Organise a discussion event for organisations for the persons with disabilities on the accessibility of the built environment.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Take accessibility and obligations under the UNCRPD into consideration in an appropriate manner in the drafting of the act on civil construction in public areas.**

**Measure:**

22. Examine accessibility as part of the regulation of the construction, maintenance and planning of public areas.

*Schedule:* 2024-2025

*Responsible body:* ME

**Objective: Continuing the development work initiated by the Prime Minister's Office, which aims to ensure the accessibility of government premises and services and equal opportunities for participation.**

**Measure:**

23. Coordinating the measures aiming to develop accessibility on government premises. Keep the accessibility information in the meeting rooms up to date in Senaattila. Carry out accessibility reviews and accessibility surveys (in connection with the planning of renovations) in cooperation with Senate Properties.

*Schedule:* continuous

*Responsible body:* Prime Minister's Office in cooperation with all ministries

**Objective: Promote the implementation of the linguistic rights of persons with disabilities.**

**Measure:**

24. Investigate the possibilities of assessing the realisation of the linguistic rights of persons with disabilities. Particular attention should be paid to the functioning of interpretation services and legislation organised in different administrative branches.

*Schedule:* during the Action Plan period, in preparation for the next government term

*Responsible bodies:* ministries

**Objective: Find out how the linguistic rights of speakers of Finnish and Finnish-Swedish sign language are realised.**

**Measure:**

25. Implement a sign language barometer.

*Schedule:* during the Action Plan period

*Responsible body:* MJ

### **Objective: Develop the implementation of Kela's interpretation services for persons with disabilities.**

#### **Measure:**

26. a) Kela organises interpretation services for persons with disabilities by purchasing them from other service providers. With regard to interpretation services, investigate the possibility of using the registration procedure.
- b) Develop working life interpretation so that the customer's service needs are taken into account individually and comprehensively.
- c) Development of the foreign travel application form so that the application process would be as smooth as possible and the information needed to resolve the matter is "in order in one go".
- d) Investigate the possibility of implementing an information campaign for the interpretation service in cooperation with customer organisations, the target group being customers and other parties subject to the obligation to provide services.

*Schedule:* during the Action Plan period

*Responsible body:* Kela

## **4.5 Safety and hazardous situations (Article 11 of the UNCRPD)**

States Parties shall take all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk. This obligation also covers situations of armed conflict, humanitarian emergencies and the occurrence of natural disasters.

### **Structural indicators**

The general principles laid down in the legislation, including the principle of proportionality, oblige the Border Guard, the rescue services and the police in the administrative branch of the Ministry of the Interior. Any actions must be justifiable in proportion to the importance, level of risk and urgency of the mission, the objective pursued, the behaviour, age, state of health and other similar aspects of

the person subjected to the measure as well as other factors affecting the overall assessment of the situation. A precondition for this is that the authorities are aware of the different population groups' needs.

The values of the rescue services, or 'humanely, professionally and reliably', are underpinned by a strongly ethical approach. Ethics is one of the hallmarks of good governance, and the purpose of a code of ethics is to reinforce public confidence in the authorities. Equal and non-discriminatory treatment should be part of the basic code of conduct of all safety authorities.

Section 18 of the Rescue Act (379/2011) contains a provision on evacuation safety in care institutions and in service and supported housing. Under this section, operators shall, by using reports and plans drawn up in advance and by taking measures based on them, ensure that the residents and the persons being treated are, in the event of a fire or other dangerous situation, able to leave the building safely, either on their own or with assistance. 'Operator' means the municipality or other body governed by public law that is responsible for the maintenance of a care institution and for the organisation of service and supported housing and a company or other organisation that operates under an agreement with a municipality or other body governed by public law. Compliance with the requirements of the Act is supervised by means of fire inspections and documentary checks carried out by the rescue authorities.

Under section 19 of the Rescue Act (379 / 2011), the operator shall draw up an evacuation safety report describing the manner in which the building or spaces are used or how the limited, weakened or varying functional capacity of persons and other factors affecting evacuation safety are taken into account when preparations are made for fires and other dangerous situations and in evacuation arrangements. The Rescue Act will be reformed during this government term 2023–2026, and the regulation on exit safety will also be examined in this context.

An amendment to the Rescue Act will enter into force on 1 January 2024, in which the responsibility for purchasing and maintaining fire alarms in apartments will be transferred from the resident to the building owner. Joint instructions and communication material are being prepared in connection with the implementation of the change, and disability organisations have been involved in this.

The Act on Emergency Response Centre Operations (692/2010) was updated to meet the accessibility requirements of the Accessibility Act. Provisions on the accessibility of the general emergency number 112 were added to the Act. It

requires the Emergency Response Centre Administration to respond to emergency calls made to the public emergency number 112 using real-time speech or text. The Emergency Response Centre Administration may also respond to an emergency call made using another method that enables interaction between the party making the emergency call and the Emergency Response Centre Administration.

The Emergency Response Centre Administration must answer the general emergency number 112 using the same means of communication as was used to contact the emergency number. At the same time, the regulation concerning the emergency text message and the user register of emergency text messages was repealed as disqualified. The accessibility amendments to the Act on the Emergency Response Centre Operations will enter into force on 28 June 2025, but responding to the emergency number must be brought to the required level by the end of 2025.

The key powers of the police (the Criminal Investigation Act, the Police Act and the Coercive Measures Act) oblige the police to act in accordance with the general principles laid down in them. The principles to be followed include respect for fundamental and human rights and the principles of proportionality, necessity and appropriateness. Any police actions must be justifiable in proportion to the importance, level of risk and urgency of the mission, the objective pursued, the behaviour, age, state of health and other similar aspects of the person subjected to the measure as well as other factors affecting the overall assessment of the situation. When exercising fundamental and human rights and powers, the police must choose the one of the justified alternatives that best promotes the realisation of these rights. No one's rights may be interfered with by police measures, and no one may be harmed or hampered more than is necessary for the performance of the task.

The pre-trial investigation measure and the resulting person's rights must be defensible in relation to the offence to be investigated, the need to investigate the matter to be investigated, and the age, health and other similar matters related to the person subject to the measure and other relevant matters. If the injured party is in need of special protection, taking into account in particular his/her personal circumstances and the nature of the offence, and it does not significantly delay the processing of the case or cause any other harm, the injured party shall be interviewed in the premises planned for the interview of persons in need of protection; the same person or persons shall carry out all interviews with the injured party, if he/she so requests; and in a case concerning a sexual offence referred to in chapter 20 of the Criminal Code and in another criminal case in which the injured party has a justified need due to the nature of the offence, the

interrogator must be of the same gender as the injured party if so requested. The pre-trial investigation authority shall, without undue delay, assess whether the injured party is in need of special protection in the pre-trial investigation or trial and whether the protection measures referred to in the Criminal Investigation Act are necessary. The assessment shall take into account, in particular, the injured party's personal circumstances and the nature of the offence.

The National Police Board has confirmed the application of an ethical code in the police administration. The ethical code consists of eight principles derived from police values. The purpose of the code is to strengthen existing good practices.

The Act on the Organisation of Social Welfare and Health Care (612/2021; social services and healthcare organisation act) contains provisions on the preparedness of wellbeing services counties for disruptions and emergency conditions (chapter 7). According to section 50 of the Act, the wellbeing services county must prepare for disruptions and emergencies through preparedness plans prepared in advance and other measures. The counties must also secure the continuity of services when they are delivered by outsourcing them to private providers. Provisions on the content of the contingency plan are laid down in Government Decree 308/2023 issued pursuant to section 50 of the social services and healthcare organisation act.

## Process indicators

The housing arrangements of persons with disabilities are taken into account in the rescue services' supervisory activities and cooperation with social welfare and health care actors. New operating models are being developed to address better the issues of people with reduced functional capacity. For example, the objective of three projects included in the Living at home safely concept of the Southern Karelia Rescue Department and South Karelia Social and Health Care District (Eksote) is to identify and manage the safety risks of living at home as early as possible. The aim of this concept implemented in broad-based cooperation is to establish a network of actors with clear responsibilities and to ensure the equal status of people using the services provided by different actors. An effort will also be made to spread this operating model to the districts of other rescue services.

The rescue services' Action plan for preventing incidents is structured around eight impact targets, in which ensuring the safety of persons with disabilities has a high profile. The following are examples of the impact targets: people become more capable of dealing with everyday safety matters, fire deaths and incidents among persons with limited functional capacity will start declining by the year 2024, rescue

departments will introduce e-services for all population groups by the year 2022, parties providing home care services will become active safety advocates by 2025, the needs of different customer groups will be systematically identified, and rescue services will provide needs-based services on the basis of uniform criteria. Stronger identification with communities, which will enhance the sense of caring, is also one of the targets.

The Action Plan for the prevention of accidents in rescue services will be updated in 2024. The update will take into account in particular the Government Programme's objective 10.1 *"Accidents are prevented effectively. The government's goal is to halve the number of fires by 2030"*.

Mutual Trust, a joint project between disability organisations, the rescue authorities and transport operators that ended in 2019, helped to map the rescue authorities' preparedness for rescuing persons with disabilities and contributed to the development of know-how and understanding related to such rescues.

An emergency call may have been submitted in Finnish sign language during the experiment (15 June 2021–31 December 2023). Interpretation is carried out by an external service provider, Kela, and these emergency calls are processed at the Turku Emergency Response Centre. The service has been available on business days between 08:00 and 16:00. The sign language service is used with the 112 Suomi application, which the user must download to their phone. The application allows the user to contact Kela's sign language interpreting service, from which the interpreter contacts the emergency response centre. The connection between the service user and the interpreter centre includes a voice connection and the possibility of subtitling via chat. The connection between the interpreter and the emergency response centre takes place through speech.

According to the Petteri Orpo's Government Programme (2.4.) *"Evaluate the possibility of using video call access for emergency calls."*

There is mandatory non-discrimination training for police personnel. The training was prepared as part of the Facts against Hate project, and it also pays attention to persons with disabilities. Police training has continued as part of the Osaavat project.

In order to facilitate the identification of hate crimes and improve classifications, the National Police Board has also implemented technical improvements in police online services. In connection with crimes against life, health or honour, the police online form now asks the person submitting the notice whether they suspect that

they have been subjected to crimes due to ethnic or national background, religion or belief, sexual orientation, gender expression, gender identity or disability. If the person answers the question affirmatively, the police information system will guide the report processor to classify the report correctly. The police receive about half of their reports online.

In potential crisis situations, persons in a particularly vulnerable position are always taken into account separately at border crossing points.

The preparedness planning of social welfare and health care was carried out before the wellbeing services counties as part of the preparedness planning of municipalities. The contents of the preparedness plans differed from municipality to municipality, and the consideration of persons with disabilities in preparedness planning has been identified as inadequate, for example, in feedback received from different disability organisations. Since the wellbeing services county reform, preparedness planning has been developed on the basis of uniform national principles, so that efforts have been made to harmonise the preparedness planning of wellbeing services counties by, for example, creating common materials for the use of wellbeing services counties. A joint preparedness planning portal (Valsu) has been built for preparedness plans. Since the summer of 2023, the Valsu portal has had a separate section for taking special groups into account in preparedness plans. The joint project of the Finnish Association on Intellectual and Developmental Disabilities, the Association of Finnish Local and Regional Authorities and the Finnish Institute for Health and Welfare, Creating the Future of Finland (1 February 2021–31 July 2023), developed guidelines and plans as well as operating models for managing municipal-level exceptional and crisis situations. The aim of the project was to support the coping and operating opportunities of persons with disabilities and of foreign backgrounds in exceptional and crisis situations. During the project, three action cards were produced, which were entered to the Valsu portal to support wellbeing services counties' preparedness planning. The action cards are: 1. Accessible communication in disruptions and emergencies 2. Cooperation between professionals in disruptions and emergencies 3. Securing services in disruptions and emergencies

The Decree on preparedness planning (308/2023) stipulates that the wellbeing services counties' preparedness plans must be ready by 31 December 2023. Regional state administrative agencies are responsible for monitoring preparedness plans. In wellbeing services counties, preparedness planning will be developed in 2024. According to section 1, subsection 4, paragraph 4 of the decree, preparedness plans must also contain plans for the implementation of cooperation with third sector actors.

## Outcome indicators

The Ministry of the Interior has identified a need to produce more information on the special safety requirements of persons with disabilities.

Underpinned by knowledge-based management, the rescue services are continuously striving to develop their capability to take special groups into account, for example by means of fire investigations and analysing the data in the accident statistics system (PRONTO).

Disability organisations consider it important that persons with disabilities are taken into account in the prevention and anticipation of hazardous situations, however without unduly restricting their independence. Disability organisations have pointed out that persons with disabilities have encountered difficulties related to housing safety, for example when it comes to the maintenance and reliability of fire alarms. For persons with physically disabilities, winters with heavy snows cause hazardous situations for several days on end, as housing companies are not always able to clear rescue roads very quickly or keep them clear. The use of the sign language interpretation service in making an emergency call has been considered important in disability organisations.

The Police University College has published a review of hate crime reported to the police in Finland in 2022.

Disability organisations have been actively in contact with wellbeing services counties and expressed their willingness to participate in the preparation of contingency plans. According to feedback received from disability organisations, persons with disabilities and disability organisations should in the future be seen increasingly as partners in preparedness planning and not only as the target of planning work. Persons with disabilities have plenty of competence and know-how related to evacuation of special groups, coping at home during power outages and planning of accessible communications. In the future, the authorities must be able to better identify and take into account the needs of persons with disabilities in preparedness planning and preparedness for disruptions.

Summary of the results of the report "Uncertainty and variable inclusion"<sup>13</sup>,  
Accessibility:

*"Safety-related shortcomings and uncertainty have a cross-cutting impact on the everyday lives of persons with disabilities. The current safety arrangements are not considered sufficient to guarantee the safety of persons with disabilities in Finland. 88% of respondents estimate that the current arrangements do not guarantee the safety of persons with disabilities in different hazard and emergency situations on an equal basis with other citizens. According to the respondents, different actors are poorly prepared for crisis situations. It is equally important to take into account how uncertainty about the implementation of the human rights of persons with disabilities causes a sense of insecurity in the everyday lives of persons with disabilities."*

## Ensuring safety and preventing hazardous situations: objectives and measures

**Objective: Promote the equality of persons with disabilities in police work.**

**Measure:**

27. Continue the equality training provided by the police and take persons with disabilities into account as part of the training.

*Schedule:* continuous

*Responsible body:* MI

13 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

**Objective: Accessibility of the emergency contact.**

**Measure:**

28. Get the responding at the general emergency number to the level required by the Accessibility Directive and the amendments to the Act on Emergency Response Centre Operations that will enter into force on 28 June 2025 by the end of 2025.

*Schedule: 2025*

*Responsible body: MI*

**Objective: Engage and consult persons with disabilities in all preparations.**

**Measure:**

29. a) The project launched by the Ministry of the Interior will prepare instructions for rescue plans, the introduction and use of civil defence shelters, maintenance and inspections.  
b) The Ministry of the Interior will launch a phase II reform of the Rescue Act.  
c) The Ministry of the Interior will draw up an action plan for halving fires in 2024.  
d) The Ministry of the Interior will update the Action Plan for incident prevention in the rescue services by the end of 2024.  
Engage persons with disabilities in the above-mentioned preparatory work.

*Schedule: during the Action Plan period*

*Responsible body: MI*

**Objective: The authorities take into account the special needs of persons with disabilities in disruptions.**

**Measure:**

30. Special issues related to persons with disabilities are taken into account in the preparedness plans for social welfare and health care.

*Schedule:* during the Action Plan period

*Responsible body:* Wellbeing services counties in cooperation with MSAH.

## 4.6 Independent living and inclusion (Articles 12, 14, 19 and 29 of the UNCRPD)

Persons with disabilities must have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others. Persons with disabilities have access to a range of services necessary to support living and inclusion in the community. Such services include residential services and personal assistance. Community services for the general population are available on an equal basis to persons with disabilities. Independent living must be supported with specialised services, support measures and accommodations. Persons with disabilities must be able to effectively and fully participate in political and public life on an equal basis with others.

### Structural indicators

Transport services for persons with disabilities are organised under the Act on Disability Services and Assistance (380/1987) and the Act on Intellectual Disabilities (519/1977). The new Disability Services Act (675/2023) will enter into force on 1 January 2025 and it will replace the current special legislation on disability services. Legislation related to the client process and organisation of services also includes the Act on Client Charges in Healthcare and Social Welfare (734/1992) and the Acts on the Status and Rights of Patients and Clients (785/1992, 812/2000). Essential aspects relevant to the independent life of persons with disabilities include the right to self-determination and safety issues, which are discussed in sections 4.2 and 5.4.5 of this Action Plan above.

The Housing Finance and Development Centre of Finland grants investment grants to housing projects of special groups. They are regulated under the Act on Subsidies for Improving the Housing Conditions of Special Groups (1281/2004). The purpose of the subsidies is to increase the supply of affordable rental housing suitable for the housing needs of persons belonging to special groups. The subsidy can only be granted together with an interest subsidy loan approved by ARA, which means that housing projects for special groups are also eligible for a state interest subsidy and a guarantee.

## Process indicators

According to Prime Minister Orpo's Government Programme, the self-determination, human rights and equality of persons with disabilities must be respected in decision-making throughout their lives, and the functioning of their daily lives must be ensured in the planning of services. The Government Programme also states that the range of housing services will be diversified to better meet the individual needs of persons with disabilities.

The disability policy objective of our country has been that in 2020 no one would have been in institutions for intellectual disabilities. At the end of 2023, there were 372 people in long-term placement in institutions for persons with intellectual disabilities and 79 people in short-term placement.

According to the Finnish Institute for Health and Welfare's Sotkanet website, at the end of 2022 there were more than 8,600 places in group homes where staff are available 24 hours a day. The amount of community-based and subsidised housing has remained at the same level for a long time, approximately 3,500–4,000 places. In various development projects, it has been estimated that a large proportion of people living in group homes would manage in their own homes with support.

The Ministry of the Environment and ARA commissioned a report on the housing situation of people with intellectual disabilities. According to the report (ARA report 2023, *Yksilöllisyys kehitysvammaisten ihmisten asumisessa*), the current structure of housing services and housing solutions are too one-sided, as they are mainly group housing and do not adequately meet individual needs nor international policies. Although various development measures have been taken and efforts have been made to improve the housing situation of people with intellectual disabilities, the report indicates that the change has stalled.

The wellbeing services counties need support in the implementation of the provisions on housing and independent living in the upcoming Disability Services Act. Existing good practices should be used in the planning and implementation of individual housing solutions for persons with disabilities.

## Outcome indicators

The Disability Services Act, which will enter into force in 2025, supports the provision of housing for persons with disabilities through versatile means, relying heavily on individual needs. The new act also contains provisions on children's participation and housing. Institutions for persons with intellectual disabilities can be ended and housing and services that meet their individual needs can be achieved by introducing more versatile ways of arranging and procuring housing and services. Housing solutions and housing arrangements must start from the perspective of ordinary housing. As people's needs are different, the importance of individual solutions is also emphasised in the implementation of housing services.

Still more housing is needed for persons with intellectual disabilities who come from institutions and move out of their childhood homes. Some persons with disabilities who live in group homes would like to live independently. This is why more versatile, needs-based housing solutions are needed. In addition to ordinary rental housing, flat groups and housing networks with support and service points are needed. Dwelling networks are a way of combining housing solutions supported in different ways, and they can simultaneously provide support related to the dwelling and the living environment and strengthen inclusion.

In spring 2023, the Finnish Institute for Health and Welfare published a report titled *Services for the Persons with Disabilities 2022*<sup>14</sup>, commissioned by the Ministry of Social Affairs and Health. The aim of the project was to examine and assess the current situation of special services for persons with disabilities before the legislative reforms entered into force. A situational picture is needed in order to monitor and assess in the coming years the impacts of the new Disability Services Act that will enter into force in 2025 and partly the social welfare and health care reform. The project discussed housing support as a whole.

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14 [https://www.julkari.fi/bitstream/handle/10024/146522/URN\\_ISBN\\_978-952-408-074-3.pdf?sequence=1?isAllowed=y](https://www.julkari.fi/bitstream/handle/10024/146522/URN_ISBN_978-952-408-074-3.pdf?sequence=1?isAllowed=y)

The Finnish Institute for Health and Welfare carried out a pilot project on the personal budgeting of persons with disabilities in 2020–2021, which was directed by the Ministry of Social Affairs and Health.<sup>15</sup> The project consisted of regional and national co-development. In the project, personal budgeting was seen as a way of organising individually tailored assistance and support, in which the person is at the centre of planning, selecting and organising the help, support and services they need. The project discussed housing services.

Summary of the results of the report “Uncertainty and variable inclusion”<sup>16</sup>, Living independently and inclusion:

*“One in five respondents (21%) feel that they have had little or no impact on their housing. In addition, one fifth of respondents with cognitive or social disabilities also feel that they have not influenced their own living at all. In all the topics surveyed, it was estimated that the right to independent life and inclusion would be poorly realised, and as regards the necessary support in decision-making and equal opportunities to participate in political and public life, almost 49% of the respondents felt that the right was realised poorly or fairly poorly. In open-ended responses, accessibility appears to be a cross-cutting condition for the realisation of inclusion: this directs choices concerning housing, affects the amount of support needed in everyday life and is a condition for participation in public and political life. Similarly, shortcomings related to accessibility are significant obstacles to everyday life and the realisation of equality. Insufficient supply of accessible dwellings restricts freedom of choice, the scarcity of affordable accessible dwellings leads even to unreasonable solutions in the lives of persons with disabilities (e.g. couples living separately, delayed independence). The furthest from the implementation of Article 19 is the situation of those who need continuous assistance and support in their daily lives. In their case, the fundamental rights related to housing are not realised (where, how and with whom they live), but often involve placing the resident in any placement that becomes available. In addition, the responses provide a very rigid view of group-form housing services (institutional practices, shortcomings in responding to individual needs and lifestyles).”*

15 [https://julkari.fi/bitstream/handle/10024/14379/URN\\_ISBN\\_978-952-343-801-9.pdf?sequence=1?isAllowed=y](https://julkari.fi/bitstream/handle/10024/14379/URN_ISBN_978-952-343-801-9.pdf?sequence=1?isAllowed=y)

16 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

## Fostering independent living and inclusion: objectives and measures

**Objective: The new Disability Services Act must remain a special law in order to ensure the realisation of the rights of persons with disabilities and the availability of services.**

**Measure:**

31. Carry out legislative measures concerning the Disability Services Act out to ensure the implementation of the rights of persons with disabilities and the availability of services.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

**Objective: The implementation of the new Disability Services Act promotes the versatile introduction of services and the development of new operating models.**

**Measure:**

32. The implementation of the new Disability Services Act promotes the versatile introduction of services and the development of new operating models. Significant services include housing support as a whole, mobility support as a whole and services for children with disabilities. The starting point of the new Disability Services Act is that services are granted on the basis of individual needs.

*Schedule:* continuous

*Responsible body:* MSAH in cooperation with the Finnish Institute for Health and Welfare

**Objective: When the new Disability Services Act enters into force in early 2025, it is important to identify the needs for legislative monitoring.**

**Measure:**

33. Promote the monitoring of the new Disability Services Act. For example, it is important to obtain reliable information on the new services of the legislation and their implementation as well as the satisfaction of the service needs of persons with disabilities and the realisation of their rights, so that the realisation of the objectives of the legislation can be assessed.

*Schedule:* continuous

*Responsible body:* MSAH in cooperation with the Finnish Institute for Health and Welfare

**Objective: Promote the implementation of individual housing for persons with disabilities. Guide state-supported housing production for persons with disabilities in an individual and diverse direction.**

**Measures:**

34. Develop housing solutions and practices for persons with disabilities in cooperation with wellbeing services counties.
35. Promote the individual housing of persons with disabilities in state-sponsored housing production.
36. Support the accessibility of existing housing stock through renovation grants.

*Schedule:* during the Action Plan period

*Responsible body:* ME and ARA the Housing Finance and Development Centre of Finland in cooperation with the MSAH

## 4.7 Movement and mobility (Articles 9, 18 and 20 of the UNCRPD)

Persons with disabilities must have an opportunity for the liberty of movement. Persons with disabilities are entitled to personal mobility with the greatest possible independence. The personal mobility of persons with disabilities must be facilitated in the manner and at the time of their choice and by providing them with the necessary reasonable assistance and support. Safeguarding accessible transportation and accessible information about the services is also important.

### Structural indicators

The starting point for mobility is accessible and functional public transport. Currently, transport services for persons with disabilities are organised under the Social Welfare Act (1301/2014), the Act on Disability Services and Assistance (380/1987) and the Act on Intellectual Disabilities (519/1977). The new Disability Services Act (675/2023) will enter into force on 1 January 2025 and it will replace the current special legislation on disability services. The starting point of the mobility support service in the new act is that a person with a disability has the right to receive the reasonable mobility support they need if they have special difficulties in mobility and cannot independently use public transport without unreasonably great difficulties. Among other things, the Act contains provisions on what needs the service is granted for, how it is implemented and the amounts and scope of the service. Efforts have been made to take flexibility and individual needs into account, for example, in terms of quantity and implementation methods.

Under the Health Insurance Act (1224/2004), Kela will reimburse travel to health care due to illness. Travel is reimbursed to a state or wellbeing service county health care unit. Travel to private health care is reimbursed on condition that the examination or treatment performed is reimbursable under the Health Insurance Act. Travel costs will be reimbursed according to how much the journey would have cost to the nearest research and treatment location where the insured can obtain examination and treatment without compromising their health, using the cheapest available mode of travel, primarily public transport. The costs of using a special vehicle, such as a car or taxi, are reimbursed if the insured person's illness, severe disability or traffic conditions require the use of a special vehicle.

A further precondition for reimbursing the use of a taxi is that the taxi must have been ordered from a dispatch centre that has concluded an agreement with Kela, if there is such a dispatch centre in the area. The legislation does not provide for

the right to a certain regular taxi for healthcare trips. However, in its compensation practice, Kela has granted rights to a regular taxi on the basis of individual consideration. For example, a customer who travels without an escort and cannot travel with a driver other than a driver who knows what kind of help he or she needs while travelling due to his or her state of health.

Persons with disabilities also have rights in public transport. Passenger rights in the European Union consist of five regulations for different modes of transport: air transport<sup>17</sup>, rail transport<sup>18</sup>, maritime and inland waterway transport<sup>19</sup> and bus transport<sup>20</sup>. Passenger rights include the right to non-discriminatory transport of persons with disabilities and persons with reduced mobility, as well as the right to assistance in means of transport and at stations.

Under the current legislation transport service providers, there is an obligation in different forms of transport to ensure that passengers have access to essential information about the services and accessible fleet. There are separate provisions on the technical requirements for accessible vehicles.

In spring 2021, a voluntary driver training model for special groups and practical exercises were added to the taxi regulation included in the Act on Transport Services, and a related model for approving training organisations and training plans was created.

EU regulations on air, rail, sea and inland waterway, and bus transport strengthen non-discrimination and equal travel rights for persons with reduced mobility and functional capacity. Most recently, Regulation (EU) 2021/782 of the European Parliament and of the Council on rail passengers' rights and obligations has been reformed. Among other things, the reform strengthened requirements related to personnel competence.

While accessibility in public transport is being developed constantly, persons with disabilities still need special services to support their mobility. Currently, transport services for persons with disabilities are organised under the Social Welfare Act

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17 (EY) N:o 261/2004 ja (EY) N:o 1107/2006

18 (EU) 2021/782

19 (EU) N:o 1177/2010

20 (EU) N:o 181/2011

(1301/2014), the Act on Disability Services and Assistance (380/1987) and the Act on Intellectual Disabilities (519/1977) and, since 1 January 2025, under the Social Welfare Act (1301/2014) and Disability Services Act (675/2023).

## Process indicators

The Ministry of Transport and Communications is currently working on several legislative drafting and policy projects related to transport services and the transport system, which are linked to accessibility.

The Government aims to reform transport services by using digitalisation. The Government Programme includes the following objective: *"The Government will develop publicly organised transport services as a whole in cooperation with municipalities and wellbeing services counties. It is ensured that the resources allocated to the organisation of services provide maximum added value."*

In addition, the Government Programme outlines the development of the availability of services, taking the needs of different user groups into account. As digital services increase, the aim is to ensure the availability of services and adequate support also for people who find it more difficult to use digital solutions.

In late 2023, the European Commission published two legislative initiatives on passenger rights. One of these aims to harmonise passenger rights regulations for different modes of transport by extending certain obligations under the revised rail liability regulation to other modes of transport. The proposal also aims to improve the right of passengers with disabilities to a free escort in air transport. The second initiative is a completely new regulation on passenger rights for multimodal journeys. The aim of the initiative is, among other things, to streamline the travel of passengers with disabilities on journeys involving a switch from one mode of transport to another.

Projects related to the promotion of accessibility have been implemented within the framework of the national transport system. The national transport system plan for 2021–2032 (the Transport 12 plan) is a strategic plan for the development of the transport system. The national transport system plan contains a description of the current situation of the transport system and changes in the operating environment, a vision for the development of the transport system until 2050, the objectives set for the plan and the strategic policies specifying them, and a

programme containing central government and municipal measures to reach the objectives. The plan also includes a central government funding programme and a summary of the impact assessment.

According to the Transport 12 plan, the Government works together with other stakeholders, particularly different population groups, to define a goal state for the accessibility of the transport system and digital services for transport, identifying the roles of the parties responsible for the system in terms of both the effectiveness of different legs of the travel chain and the realisation of passengers' rights. The central government should also determine nationally significant connections on which the aim would be at high-standard accessible travel chains following the design for all principle, and the availability of digital accessibility information would also be ensured. In addition, pilot projects for accessible travel chains will be implemented. In order to promote the plan with respect to accessibility, the Ministry of Transport and Communications appointed a working group in autumn 2021 to implement the accessibility measures included in the national transport system plan.

In autumn 2023, a vision for transport accessibility was published, which sets the target state for accessibility referred to in the Transport 12 plan<sup>21</sup>. The vision determines what kind of development is sought in the accessibility of the transport system throughout Finland. The vision aims to ensure smooth, safe and independent travel for everyone, regardless of personal constraints. The values of the vision are an accessible travel chain, multisensory approach, user experience and cooperation. The vision contains objectives that apply to different aspects of the transport system.

The aim is to implement the objectives of the accessibility vision as part of the ministry's ordinary official work. The accessibility vision will also be combined with the follow-up work of the Transport 12 plan. In 2024–2025, the ministry intends to organise discussion events related to the vision for key actors and organisations to support the change in attitudes and to find solutions that exceed the minimum requirements of legislation.

The Ministry of Transport and Communications is also working on a legislative project on micro-mobility in accordance with the Government Programme. The Government Programme of Prime Minister Petteri Orpo states that legislation

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21 <https://valtioneuvosto.fi/-/1410829/esteettomyysvisio-julki-tavoitteena-sujuva-turvallinen-ja-itsenainen-matkanteko-kaikille>

guiding micro-mobility (e.g., electric scooters) will be created during the government term and that cities and municipalities will be provided with tools for managing micro-mobility. On 16 October 2023, the Ministry of Transport and Communications appointed a working group to prepare a government proposal on legislation governing micro-mobility (<https://lvm.fi/-/tyoryhma-valmistelemaan-mikroliikkuminen-ohjaavaa-lainsaadantoa>). The rapid development of micro-transport services has made mobility easier and faster. At the same time, new means of transport and increased speeds have given cause for concern from the perspectives of traffic safety and accessibility. The ongoing legislative project assesses what kind of regulation is needed in order to ensure the safest possible future mobility and parking of light electric vehicles and bicycles and does not endanger accessibility.

For a number of years, the Ministry of Transport and Communications has striven to take into account the perspective of older people and persons with restricted functional capacity in the preparation of different projects by organising various hearings and requesting statements from NGOs or their umbrella organisations. The organisations will also be involved in the future.

The national organisation of the statutory duties and responsibilities of the so-called station manager at a railway station is also pending. An extensive assessment memorandum has been prepared and circulated for comments on 16 August 2024. The station manager is a term used in EU regulation, referring to a party operating at a railway station to whom, as one of the railway operators, obligations related to rail traffic management and accessibility have been imposed in legislation. The roles of the station manager are laid down in EU regulations, which are directly applicable. The concept of a station manager has not been specified in relation to Finnish conditions, and the tasks of the station manager have not been specifically assigned to operators in other ways in national legislation. For this reason, the tasks or functions assigned to station managers by EU regulations are currently not being implemented in Finland as intended in the regulation – at least not in all respects.

## Outcome indicators

In 2017, the Ministry of Transport and Communications published an action plan for its administrative branch, "Making digital transport and communications services accessible. Action Programme 2017–2021". In addition to the ministry, the programme was implemented by the Finnish Transport and Communications Agency, the Finnish Transport Infrastructure Agency and the Finnish Meteorological

Institute. The Action Plan was divided into five more detailed sub-programmes, including a total of 20 different measures. One of the key measures was to clarify legislation and update guidelines. The definition and availability of accessibility information and awareness of mobility service providers were improved. In addition, agencies in the transport and communications sector must in the future provide information on alternative services to those who are unable to use online services and are thus at risk of exclusion.

During the Action Plan, the agencies have invested in raising awareness regarding accessibility and in the research and development of digital services. Studies published by the Finnish Transport and Communications Agency have examined ways in which, for example, automated vehicles and intelligent transport services can improve the conditions for older people and persons with disabilities to use digital transport services.

As a rule, the Action Plan only concerned digital services. However, it has also had a clear link with the general accessibility of transport and communications. The development of transport services is particularly emphasised when planning and implementing the measures of the national transport system plan (Transport 12).

As part of the Transport 12 work, and in 2022, the Ministry of Transport and Communications published a report on the accessibility of public transport travel chains.<sup>22</sup> In the study, passengers with visual and hearing impairments, passengers with reduced mobility and unhindered users examined how the current public transport services, transport infrastructure and travel chains function from the perspective of different user groups. In the study, passengers belonging to different disability groups tried the public transport travel chain and booking a trip. During the trial trip, passengers used both commuter and long-distance services to simulate an everyday situation. The trial trips revealed significant accessibility gaps in several parts of the travel chain. In particular, the fragmented nature and inadequacy of information posed challenges.

Summary of the results of the report "Uncertainty and variable inclusion"<sup>23</sup>, Mobility:

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22 <https://lvm.fi/-/selvitys-joukkoliikenteen-matkaketjujen-saavutettavuudessa-parantamisen-varaa-1856984>

23 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

*"The results of the report show that the freedom of movement of persons with disabilities is considered poorly realised in Finland. 51% of the respondents feel that physical activity in their daily lives is going poorly or variably. Additionally, 80% of respondents estimated that persons with disabilities had limited opportunities for independent mobility, and 81% thought that public transportation accessibility was poorly implemented (badly/somewhat poorly/variably). The possibility of personal and free movement is a fundamental human right, which is essentially linked to all other areas examined in the report. When mobility is implemented poorly or variably due to a lack of services and limited scope, persons with disabilities cannot participate in society in a fair manner."*

## Fostering the right to independent movement and mobility: objectives and measures

**Objective: To secure sustainable mobility services with suitable means of transport for all. In order to ensure an adequate service level for mobility, the organisation of public transport must be examined as a whole. At the same time, it must be ensured that the resources allocated to the organisation of transport provide maximum added value. This requires a strong increase in the use of information related to the implementation of mobility services across administrative branches.**

### Measure:

37. Promote the availability of accessible mobility services for the needs of different customer groups in accordance with the accessibility vision. Promote the realisation of accessibility in transport services and infrastructure and promote the availability and use of information on accessible mobility services.

*Schedule:* during the Action Plan period

*Responsible body:* MTC

**Objective: Development of staff training for service providers and producers. Service providers and producers recognise the needs of different special groups as well as the services and assistance they need by developing staff training so that it is possible to better meet persons with disabilities and limited functional capacity.**

**Measure:**

38. Promote the expertise of service providers and producers by continuing cooperation between different actors and administrative branches.

*Schedule:* during the Action Plan period

*Responsible body:* MTC in cooperation with different actors

## 4.8 Education (Article 24 of the UNCRPD)

Persons with disabilities are entitled to education on an equal basis with others. Persons with disabilities may not be excluded from the general education system on the basis of their disability. Persons with disabilities must be able to access an inclusive, quality and free primary education and secondary education in the communities in which they live. Reasonable accommodations of the individual's requirements must be provided for persons with disabilities. They must receive the support required within the general education system.

### Structural indicators

The cross-cutting goal of the different levels of the Finnish education system is, in keeping with the principles of continuous learning, enabling education for everyone. The legislation on early childhood education and care, preschool and basic education, basic education in arts, liberal adult education, general upper secondary education, vocational education and training, and education provided by the universities and universities of applied sciences enable education.

Under the Non-Discrimination Act (1325/2014), all education programmes must allow reasonable accommodations needed by persons with disabilities. The organiser of early childhood education or instruction must assess how its activities affect different population groups and how equality is otherwise realised in its

activities and take the necessary measures to promote equality. The promotion measures must be effective, appropriate and proportionate taking into account the operating environment, resources and other circumstances of the early childhood education and care or educational institutions. The organiser of early childhood education and care or education must ensure that the educational institution has a plan for the necessary measures to promote equality.

The legislation on early childhood education and care, education and training contains provisions which specifically safeguard special support for persons in need of special support and with disabilities and take them into account as part of education. Personalised plans help address the individuals' different needs for guidance and support. To ensure the realisation of the rights of persons with disabilities, the legislation contains provisions on enabling special support, special education or special arrangements to allow them to attend school or complete their education, training or qualifications.

The legislation provides for individuals' rights, and education and training providers' obligations, that enable equal participation in early childhood education, learning and training as well as the provision of support and assistant services and aids required for attending education. Once they have completed their basic education, the services required by students with disabilities are mainly organised under the Disability Services Act.

To foster the inclusion of pupils and students, there are provisions on pupil and student bodies as part of the organisation of teaching or education as well as on student welfare, which refers to promoting and maintaining students' learning, good psychological and physical health and social well-being as well as activities that promote the prerequisites for them in the educational institution's community.

Under the Compulsory Education Act (1214/2020), which entered into force in 2021, compulsory education lasts until the person turns 18. A student subject to compulsory education or their guardian can apply for an exemption from compulsory education if a long-term illness or disability prevents its completion.

### **Early childhood education and care**

The Act on Early Childhood Education and Care (540/2018) was reformed during Prime Minister Marin's government term (2019–2023) with regard to support received by the child in accordance with the Government Programme entry. A general, intensified and special support model was created in early childhood education and care, and the implementation of early childhood education and care

in accordance with inclusive principles was recorded in the Act. In the reform, a new chapter on child support in early childhood education and care was added to the Act on Early Childhood Education and Care. The amendment entered into force on 1 August 2022. The Act on Early Childhood Education and Care recognised support even before, but it did not contain provisions on the structure of support provided in early childhood education and care, for example.

The reform of support for early childhood education and care strengthened the implementation of the UN Convention on the Rights of the Child (Finnish Treaty Series 59–60, entry into force in Finland 1991) and the UNCRC and the UNESCO Salamanca Declaration (1994) in Finland.

In accordance with section 15a of the Act on Early Childhood Education and Care, children have the right to general, intensified or special support in early childhood education and care in accordance with their individual needs as soon as the need for support has emerged. If the child participates in the early childhood education and care of more than one ECEC provider or producer and the child has a need for support, the support must be planned, implemented and assessed in cooperation with ECEC providers and producers.

Sections 15b–15d of the Act lay down provisions on the implementation of support, support services and the assessment of the need for support. Support provided to a child may take the form of pedagogical, structural and therapeutic measures. The child has the right to receive instruction and consultation provided by a special needs teacher in early childhood education and care, interpretation and assistance services required for participating in early childhood education and care, and assistive devices if necessary. The child's need for support must be assessed regularly. Pursuant to section 23 of the Act, the child's need for support as referred to in section 15b, the support measures and their implementation, as well as the assessment of the effectiveness of the support must be recorded in the child's early childhood education and care plan. If the assessment of the need for support requires the expertise of social welfare and health care authorities, they must participate in the assessment at the request of the ECEC provider.

Under section 15e of the Act, an administrative decision must be made on the child's support. In accordance with section 62, the guardians may demand a rectification of the decision from the regional state administrative agency. Previously, guardians have not been able to appeal on any decision on the support received by the child because an administrative decision on the child's support

would not have been made. The administrative decision on the child's support significantly increased the legal protection of guardians and the child's right to support needed in early childhood education and care.

The amendment was considered to strengthen the position, legal protection and equality of children with disabilities, illnesses and delays in their development, regardless of the municipality of residence or place of the child's early childhood education and care. The child's right to the support they need is also strengthened by the clarifications made to the Act in sections 35 and 38. If the day-care centre/ family day-care centre has one or more children with disabilities or children who are in need of intensified or special support, this must be taken into account in the number of children or persons referred to in subsection 1 of the Act, unless the day-care centre has an assistant for such children.

### **Pre-primary and basic education**

Under section 16 of the Basic Education Act (628/1998), pupils with difficulties in learning or attending school have the right to part-time special needs education alongside other education. According to section 16a, pupils who need regular support or several forms of support at the same time must be given intensified support in accordance with the learning plan prepared for them. Section 17 of the Basic Education Act provides for special support consisting of special needs education and other support provided under the Basic Education Act.

Special needs education referred to in section 17 is organised in connection with other instruction or in part or in full in a special class or in another suitable place, taking into account the pupil's interests and the prerequisites for providing education. In order to provide special support, a written decision must be made specifying the pupil's main teaching group, any interpretation and assistant services as well as other services and, if necessary, the pupil's exceptional arrangement of teaching. Before making a decision, the pupil and his or her guardian must be heard, and a report on the progress of the pupil's learning, the intensified support received by the pupil and the overall situation must be obtained from the persons responsible for the pupil's teaching, and an assessment of the need for special support must be obtained. If necessary, this report is supplemented by a psychological or medical expert statement or a social report. Without the pedagogical examination described above, a decision on special support may be made if, on the basis of a psychological or medical assessment, it appears that the pupil's teaching cannot be provided due to disability, illness, delayed development or emotional disorder or other similar special reason.

Under section 31 of the Basic Education Act, pupils with disabilities and other pupils in need of special support are also entitled to the interpretation and assistance services, other teaching services and special aids required to participate in education free of charge.

Section 10 of the Basic Education Act contains provisions on the school's language of instruction, which may also be sign language. According to section 10(2), persons with hearing impairments must also be taught in sign language if necessary.

### **General upper secondary and vocational education and training and preparatory education for degree education**

Under section 28 of the Act on General Upper Secondary Education (714/2018), students who struggle to complete their studies due to special linguistic difficulties or other learning difficulties have the right to special needs education and other learning support as required by their individual needs. The teaching staff work together to implement the support measures. The need for support must be assessed at the beginning of the studies and regularly as the studies progress. At the student's request, the support measures are recorded in their personal study plan.

Under the Vocational Education and Training Act (531/2017), a student is entitled to special support if, due to learning difficulties, disability, illness or some other reason, he or she needs long-term or regular special support for learning and studying in order to achieve the vocational skills requirements or learning outcomes specified in the qualification or grounds for education. Special support refers to systematic pedagogical support based on the student's objectives and capabilities and special teaching and study arrangements. The task of an education provider with the task of providing demanding special support is to provide education for students with difficult learning difficulties or a severe disability or illness that requires individual, extensive and diverse special support. As part of demanding special support, training is organised that prepares students with the most difficult disabilities for work and independent living.

The special support referred to in the Act on Preparatory Education for Degree Programmes (1215/2020) has the same content as the Act on Vocational Education and Training. Preparatory education for degree programmes can also be organised as demanding special support.

## Higher education

Legislation applicable to higher education (section 37a of the Universities Act 558/2009 and section 26 of the Act on Universities of Applied Sciences 932/2014) stipulates that a matter related to the applicant's state of health or functional capacity may not be an obstacle to admission as a student.

The Ministry of Education and Culture has instructed higher education institutions to prepare their own accessibility plans on the basis of the common guidelines for the accessibility plan for higher education in 2022. The achievement of the objectives of the accessibility plans of higher education institutions is monitored regularly in higher education institutions.

## Process indicators

The Ministry of Education and Culture's ongoing projects aiming to reform the legislation on education are based on the objectives of Prime Minister Petteri Orpo's Government Programme. The aim of the Government Programme is to clarify the support for learning and to harmonise the chain of support from early childhood education to upper secondary education. The aim is for each learner to receive the support they need during the education path.

The Government will reform the legislation on support for pre-primary and basic education with the aim of securing sufficient support and reducing the administrative burden on teaching staff. Necessary small-group teaching and teaching provided in special classes are also possible. The aim is to submit the government proposal to the Parliament in autumn 2024. Legislative drafting in the Ministry of Education and Culture is based on the Right to Learn development programme and the development proposals presented in its final report based on the work of the working group.

The task of the working group developing support for upper secondary education is to prepare proposals for 1) harmonising support for learning in general upper secondary education and vocational education and training in accordance with the Government Programme, taking into account the development of student guidance; 2) early detection of support needs and organisation of different forms of support at secondary level; 3) securing the necessary support and guidance for learning and multiprofessional support for students in upper secondary education and 4) supporting pedagogical support measures, guidance and the student's well-being in a comprehensive manner.

The Ministry of Education and Culture and the Finnish National Agency for Education have launched a programme to develop support for learning in general upper secondary education and vocational education and training, the aim of which is to direct the support system for learning in general upper secondary education and vocational education and training towards the legislative changes mentioned in the Government Programme. Learning support refers to an extensive entity consisting of personalisation of studies, guidance counselling, special support/education, and measures supporting the student's study skills and well-being. A student whose well-being, coping and smooth studies are the objectives of the support is at the core of learning support. This includes a more systematic mapping of students' guidance and support needs and the provision of timely and appropriate pedagogical support measures and communal services to strengthen the student's well-being and ability to study.

The Government will also prepare a report on the functioning of training preparing for education degree. The aim of the study is to assess how the training helps those aiming for upper secondary school and vocational education and training and supports the strengthening of students' basic skills. The report will be used to assess possible needs for legislative amendments. One of the focus areas is how preparatory training for degree programmes serves different groups, such as students with the most severe disabilities.

The extension of compulsory education that entered into force in 2021 will be assessed in accordance with the monitoring plan until the end of 2024. According to government proposal 173/2020, the impacts of extending compulsory education on young people's access to education, attachment to education, completion of upper secondary education and placement in further studies or employment will be monitored systematically.

## Outcome indicators

Summary of the results of the report "Uncertainty and variable inclusion"<sup>24</sup>,  
Education:

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24 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

*“The implementation of the right to education and non-discrimination in education varies according to the responses. It is noteworthy that, based on the responses, the local school principle, support for studies and reasonable adjustments made by educational institutions are mostly found to be realised fairly well or well. On the other hand, the general view of the equality of persons with disabilities in education is more negative. After comprehensive school, equal access to education does not carry the same inclusive principle of equality as in basic education. Learners experience discrimination on the basis of disability from comprehensive school to lifelong learning – no research questions were asked about early childhood education and care. Randomness in the realisation of equality in education can be seen in open-ended responses to how the areas of accessibility of education (physical and material, pedagogical, social, psychological) and heavy bureaucracy overlap and layer in the everyday lives of persons with disabilities. This randomness is culminated in the power that individual actors, with their attitudes and know-how, have in the formation of these experiences and the realisation of rights.”*

## Fostering equal opportunities for education and training: objectives and measures

### **Objective: Reform legislation on support for learning in pre-primary and basic education.**

#### **Measure:**

39. The aim of the reform is to secure sufficient support and reduce the administrative burden on teaching staff. The aim is to offer support for learning individually and in accordance with the pupil's needs, and that the forms of support are uniform, clear and versatile nationally. In addition, the necessary small-group teaching and the teaching provided in special classes are possible, and sufficient numbers of special needs teachers are ensured.

*Schedule:* the new legislation will enter into force on 1 August 2025

*Responsible body:* MEC

**Objective: Reform the legislation on support for learning in general upper secondary education.**

**Measure:**

40. The aim of the reform is to clarify the support for learning in general upper secondary education and to harmonise the chain of support for learning from early childhood education to upper secondary education. The aim is to secure the necessary support, guidance and multiprofessional support for learning for general upper secondary education students.

*Schedule:* the new legislation will enter into force on 1 January 2025

*Responsible body:* MEC

**Objective: Reform the legislation on support for learning in vocational education.**

**Measure:**

41. The aim of the reform is to clarify the support for learning in vocational education and to harmonise the chain of support for learning from early childhood education to upper secondary education. The aim is to secure the necessary support, guidance and multiprofessional support for learning for upper secondary education students.

*Schedule:* the new legislation will enter into force on 1 January 2026

*Responsible body:* MEC

**Objective: Assess the effectiveness of preparatory education for degree education and possible legislative changes**

**Measure:**

42. The report to be completed at the end of June 2024 examines the entity of preparatory education for programmes leading to qualifications in terms of statistics, different processes, strengths and development needs, fulfilment of the objectives and the operating environment. In addition, the entity is examined from the perspective of responding to the students' diverse needs, the functioning of the cooperation structures and how the preparatory education serves different groups. The aim of the report is to produce information for possible needs for legislative amendments.  
*Schedule:* the report will be completed in summer 2024, preparation of legislative amendments in autumn 2024.  
*Responsible body:* MEC

**Objective: Monitor the implementation of compulsory education.**

**Measure:**

43. Assessment of the achievement of the objectives of the compulsory education reform, the success of its implementation and its effectiveness as a compilation study that draws on the information obtained from thematic monitoring, reports and evaluations. The focus is on the realisation of the key objectives of the reform, especially the completion rate of upper secondary education, the increase in educational equality and non-discrimination, the prevention of exclusion, the improvement of the well-being of children and young people, and the transition to working life and further studies.  
*Schedule:* Monitoring period until the end of 2024  
*Responsible body:* MEC

**Objective: Secure the rights of persons with disabilities in the reform of legislation on restricted suitability**

**Measure:**

44. During the government term, a reform of the legislation on restricted suitability will be prepared on the basis of the development needs identified in the final report of the restricted suitability project. The UNCRPD and the Non-Discrimination Act will be taken into account in the reform of the restricted suitability legislation, and the possibility for disability organisations to participate in the preparation process will be ensured.

*Schedule:* The drafting of this legislation will start in spring 2025.

*Responsible body:* MEC

**Objective: Examine the availability of interpretation services in early childhood education and care, pre-primary and basic education.**

**Measure:**

45. For both sign language and speech-impaired interpretation services, clarity would be needed for children and young people. In early childhood education and care and pre-primary and basic education, the organisation of interpretation services is the responsibility of the education provider. No national statistical data is available on the organisation of the services. It would be necessary to examine how the right of children and young people to the interpretation services they need is realised in early childhood education and care/school. Other than teaching situations must also be taken into account; from the perspective of inclusion, for example, a teacher/assistance using native sign language is not always sufficient support.

*Schedule:* the examination requires funding, cannot set a schedule

*Responsible body:* MEC in cooperation with MSAH.

## 4.9 Health and rehabilitation (Articles 25 and 26 of the UNCRPD)

Persons with disabilities have the right to the enjoyment of the highest attainable standard of health without discrimination on the basis of disability. Persons with disabilities must be provided with the same range, quality and standard of free or affordable services as provided to other persons. Persons with disabilities are also entitled to the health services that they need specifically because of their disabilities. Health services for persons with disabilities must be provided as close as possible to their own communities, including in rural areas.

Comprehensive rehabilitation services needed by persons with disabilities must be provided, including through peer support, to enable them to attain and maintain maximum independence, full physical, mental and social ability, and full inclusion and participation in all aspects of life.

### Structural indicators

The Constitution of Finland grants everyone the right to adequate social and health care services. The Act on the Status and Rights of Patients (785/1992) states that every person who is permanently resident in Finland is without discrimination entitled to health and medical care required by his or her state of health. The care of the patient has to be arranged so and he/she shall also otherwise be treated so that his/her human dignity is not violated and that his/her conviction and privacy is respected. The mother tongue, individual needs and culture of the patient have to be taken into account as far as possible in his/her care and other treatment.

According to the Act on Organising Healthcare and Social Welfare Services (612/2021), the wellbeing services county is responsible for organising social welfare and health care in its area and is responsible for the social welfare and health care of its residents. 21 wellbeing services counties and the city of Helsinki are responsible for organising primary health care, social welfare, specialised medical care, oral health and substance abuse services, services for the disabled and housing services for the elderly. The HUS group has a separate statutory responsibility for organising specialised medical care.

Provisions on rehabilitation are laid down in various substance acts, such as the Health Care Act (1326/2010), the Social Welfare Act (1301/2014), the Disability Services Act (380/1987; 675/2023), the Act on the Rehabilitation Benefits and Rehabilitation Allowances of the Social Insurance Institution (566/2005), the

Employment Pensions Act and several other acts. The substance acts contain more detailed provisions on, for example, the organisation of rehabilitation and the division of responsibilities.

In 2017, the Rehabilitation Reform Committee published its proposal for the reform the rehabilitation system. Rehabilitation reform was carried out in accordance with the committee's proposals in 2020–2023. Several of the committee's proposals and issues related to their implementation were related to persons with disabilities and their rehabilitation services.<sup>25</sup>

## Process indicators

As part of the Government Programme of Prime Minister Petteri Orpo's government, the national service reform will reform the legislation on social welfare and health care content and the related guidance to correspond to the current social welfare and health care structures and national social welfare and health care objectives. The national service reform complements the reform of the structures of social and health care services, in which the responsibility for organising services was transferred from municipalities to wellbeing services counties at the beginning of 2023. The national service reform supports the wellbeing services counties' own change programmes, which aim to improve the efficiency of social welfare and health care functions, reform operating methods and develop remote and digital services. Five objectives have been set for the national service reform:

- strengthening prevention
- improving the integration, availability and continuity of services
- clarifying the service system
- increasing impact and cost-effectiveness
- strengthening preparedness and the management of disruptions

The Government is implementing reforms in social welfare and health care services that will enable the wellbeing services counties to prepare for future challenges more effectively. The structure of the services will be reformed to function gradually. The aim is to shift the focus from corrective services to earlier support, assistance and prevention. Timely access to care and services is ensured and queues created for services are dismantled. The effectiveness of the services will

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<sup>25</sup> Rehabilitation reform in 2020–2022.

be improved. In the development of services, factors that weaken well-being are addressed extensively, ranging from mental health problems among young people to shortcomings in services for the elderly.

Prime Minister Orpo's Government Programme pays attention to ensuring inclusion and hearing persons with disabilities. There are various local-level client forums in the field of health care, as well as operating models in which peer support persons from NGOs support and advise people with illnesses and disabilities during the treatment and rehabilitation process. Kela has client and partnership forums for rehabilitation matters.

In accordance with the Government Programme rehabilitation that works reduces complications, the need for hospital care, hospitalisation or return to hospital. In addition, rehabilitation supports participation in work and studies. The reform of rehabilitation will continue as proposed by the rehabilitation committee and as planned for 2023–2027, while maintaining multi-channel funding. Many of the proposals also concern persons with disabilities. According to the Government Programme, the regulation of medical rehabilitation will be specified further in order to reduce overlapping measures and better target the available resources. Develop competence in rehabilitative nursing, create indicators for assessing the effectiveness of rehabilitation and take into account the significance of rehabilitative nursing in preserving functional capacity. The Government Programme outlines that the availability of special personal aids will be streamlined.

As stated in the Government Programme, starting in autumn 2023, efforts will be made to rehabilitate children and young people's neuropsychiatric disorders and rehabilitation services through discretionary rehabilitation provided by Kela. A total of EUR 25 million of non-recurring additional funding has been allocated to Kela's discretionary rehabilitation services for children and young people. Kela has announced that it will specifically direct the funds to LAKU family rehabilitation and Oma Väylä rehabilitation targeted at young people. The additional funding can be used until 2027.

The rehabilitation reform will continue in accordance with the Government Programme, preserving multi-channel funding.

## Outcome indicators

Summary of the results of the report "Uncertainty and variable inclusion"<sup>26</sup>, Health, rehabilitation:

*"The majority of respondents felt that either access to rehabilitation was implemented poorly (40% poorly/fairly poorly) or there were uncertainties related to access (21% varying). Many of the respondents feel that excessive bureaucracy, barriers in services and high staff turnover have led to insufficient health care services and rehabilitation or that they have not been suitable for themselves. In addition, many of the respondents have found that their applications are receiving increasingly fewer positive decisions."*

## Improving access to rehabilitation and health services: objectives and measures

### **Objective: Improving the working and functional capacity of persons with disabilities and enabling inclusion.**

#### **Measure:**

46. Develop rehabilitation on the basis of the rehabilitation committee's proposals and rehabilitation reform measures, taking into account the rehabilitation needs of persons with disabilities. The grounds for delivering medical rehabilitation aids will be updated. Assess the need to update the guide for referral to medical rehabilitation in relation to the rehabilitation needs of persons with disabilities.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

26 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

**Objective: Develop rehabilitation services, benefits and their implementation.**

**Measure:**

47. a) Kela develops rehabilitation services for Sámi speakers, family rehabilitation services for children with severe illnesses, and rehabilitation for lifestyle changes for people with diabetes and sleep apnoea.
- b) Investigate the possibility of removing the term “fault” (vika) in vocational rehabilitation from rehabilitation legislation
- c) In connection with the recommendations of the rehabilitation reform committee, a cooperation guideline was completed in spring 2024 for implementers of statutory rehabilitation benefits, with the aim of improving the smooth implementation of rehabilitation benefits implemented by different institutions. The deployment of the cooperation instructions will continue. In addition, the development needs related to the guideline are reviewed annually between the implementers. The aim is to improve customer guidance for primary services and smooth implementation.

*Schedule:* during the Action Plan period

*Responsible body:* Kela

**Objective: Streamline the use of an online medical certificate.**

**Measure:**

48. Plan an online medical report combining B and C statements. The statement is planned so that it is as easy and smooth as possible to use in health care. The aim is to increase the use of the online medical certificate.

*Schedule:* by the end of 2026

*Responsible body:* Kela

## 4.10 Work and employment (Article 27 of the UNCRPD)

Persons with disabilities have the right to work on an equal basis with others. They have the right to gain a living by work freely chosen. The work environment must be open, inclusive and accessible to persons with disabilities. The right to work must also be ensured for those who acquire a disability during the course of employment.

### Structural indicators

Under the UNCRPD, an effort should primarily be made to promote acquisition of work experience and career advance in the open labour market when promoting the employment of person with disabilities. In this respect, work in which the disability does not cause a material disadvantage should always be the primary starting point. Employment in this type of work can be supported by various services, the most important of which are related to assistive devices and other work accommodation measures.

Section 15 of the Non-Discrimination Act (1325/2014) contains more details on reasonable accommodations through which the equality of persons with disabilities is realised. The reform of the Non-Discrimination Act (2023) further specified the Act's concept of reasonable adaptations to better comply with the provisions of the UN Convention on the Rights of Persons with Disabilities. Under the Non-Discrimination Act, authorities, employers, suppliers of goods or services and training are obliged to make reasonable accommodations in order to realise the equal rights of persons with disabilities. The reform of the Act specified the regulation further so that when assessing reasonableness, the needs of persons with disabilities must be taken as the starting point more clearly than before. The notion of reasonable accommodation was also specified in such a way that the content of public services and not just (physical) access to the services are more clearly covered by the adjustments.

Under section 8 of the Act on Public Employment and Business Services (916/2012), the employment and economic development office, the customer service centre of the employment and economic development administration, or the centre for economic development, transport and the environment must provide public employment and business services impartially, in compliance with the same principles, irrespective of an individual client's gender and matters referred to in section 8(1) of the Non-Discrimination Act (1325/2014). Employment and economic development authorities must present work and training options, job vacancies,

and jobseekers so as to ensure equal opportunities for individual clients to job-seeking, professional development, and training, irrespective of gender and matters referred to in above provision.

Public employment and business services (TE services) will be transferred to municipalities as of 1 January 2025. The Act on Public Employment and Business Service (916/2012) has been repealed by the Act on the Implementation of the Act on the Organisation of Employment Services and Certain Related Acts (383/2023). The new act will enter into force on 1 January 2025. Under section 5 of the Act on the Organisation of Employment Services (380/2023), the implementation of non-discrimination and equality between women and men in the labour market must be promoted in the organisation, provision, development and dissemination of information on public employment services. In the organisation of public employment services, particular care must be taken to promote the employment of those in a weak labour market position.

The Act on Public Employment and Business Service (916/2012) contains provisions on pay subsidies granted to employers. A pay subsidy is a subsidy intended to promote the employment of an unemployed jobseeker, which the TE office can grant to the employer for pay costs. The purpose of the work supported by pay subsidy is to promote the employment of unemployed jobseekers in the open labour market by improving their vocational skills. Work supported by pay subsidies also promotes the opportunities of people with reduced work ability to find work and participate in working life. The TE office may grant a pay subsidy when the opportunities of an unemployed jobseeker to obtain suitable work have significantly decreased due to a disability or illness. The support is granted to lower the recruitment threshold with the aim of putting persons with disabilities or a long-term illness in a more equal position in recruitment with jobseekers who do not have a disability or illness.

The TE office may also grant a subsidy for arranging working conditions to an employer if the disability or illness of a person to be employed or already employed requires the purchase of work equipment or changes to be made at the workplace and the costs incurred by the employer for the acquisition or change are considered significant considering the employer's financial situation. A subsidy can also be granted to compensate for assistance provided by another worker. Provisions on the costs to be compensated as support for arranging working conditions, the maximum amount and duration of the support, and the procedure for granting support are laid down in a government decree.

As it is not always possible to find employment in the open labour market, intermediate labour market actors play an important role in promoting employment in the open labour market. The concept of intermediate labour market does not have established content that is jointly accepted by all users. In the employment and economic administration, the intermediate labour market refers to fixed-term job opportunities offered to the unemployed either in a wage-subsidised employment relationship or a work try-out without an employment relationship. In a broad sense, intermediate labour market actors also include municipalities, educational organisations and various projects established to promote the employment of those in a weak labour market position. Employment or job opportunities in the intermediate labour market can be made possible through financial support from society. It is expected that the employee will be offered more work guidance and support in finding job opportunities than in the normal labour market. Employers operating in the intermediate labour market are mainly associations and foundations that employ people.

Provisions on activities, work activities and job coaching that support the employment of persons with disabilities are currently laid down in section 27 of the Social Welfare Act 1982 (710/1982) and sections 2(4) and 35 of the Act on Intellectual Disabilities (519/1977). Under the Act on Intellectual Disabilities, an effort must be made to organise job coaching, work activities and other activities that provide incentives for a person in need of special care. Section 27d of the Social Welfare Act provides for measures to promote employment of a person who, due to a disability, illness or other similar reason, has special long-term difficulties in coping with normal life activities and who, in addition to the services of the labour administration, needs support measures to find employment in the open labour market. Work based on employment can be organised as part of activities that support employment. Under section 27e of the Social Welfare Act, work activities are organised for persons with disabilities who, due to their disability, are not able to participate in work and whose subsistence is mainly based on benefits granted on the basis of illness or disability. When the new Disability Services Act enters into force on 1 January 2025, provisions on the work activities of persons with intellectual disabilities will be laid down in section 27 of the Disability Services Act (675/2023).

In services for persons with intellectual disabilities, the difference between work and day activities is often unclear, and work activities can be implemented as a tool for supporting employment or as part of day activities. Services for persons with intellectual disabilities should primarily be organised on the basis of the Social Welfare Act, even though the work activities and job coaching referred to in the Act on Intellectual Disabilities are similar to the work activities of persons

with disabilities referred to in the Social Welfare Act. A survey conducted on municipalities and joint municipal authorities in 2019 revealed that the use of activities supporting employment in accordance with the old Social Welfare Act is limited. This can also be seen in the statistics. In practice, however, work activities are usually organised for persons with intellectual disabilities on the basis of the Act on Intellectual Disabilities, as the work activities referred to in the Social Welfare Act have not been considered an adequate or suitable service for persons with intellectual disabilities. In addition, the necessary travel to work organised on the basis of the Act on Intellectual Disabilities is free of charge under section 4(2) of the Act on Client Charges in Healthcare and Social Welfare, which makes the service more economically advantageous for the participant.<sup>27</sup>

In most municipalities, work activities and job coaching in accordance with the Act on Intellectual Disabilities have been carried out either entirely or mostly in work and day activities centres or in workshops. Work activities offer individual coaching or guidance, group activities and assessment of work or functional capacity. In practice, the work activities of persons with intellectual disabilities in the work and day centres have often remained a permanent solution, and the open work activities at the workplace have not often led to paid employment.<sup>28</sup>

Work activities have also been organised as so-called open work activities, in which the person has been placed in work tasks outside the work centre at ordinary workplaces. The challenge of this activity may have been that it resembles employment. Open work has evolved in practice and has been in use since the 1980s. People with intellectual disabilities are usually paid financial compensation for participating in work activities. This compensation is usually referred to as a work component allowance. The work component allowance has been paid in both work and day activities, and the amounts and practices regarding its payment vary regionally. With the partial reform of the Non-Discrimination Act, changes were made to the legislation on working life. In the future, the Non-Discrimination Ombudsman will be competent to deal with individual cases of working life, and the employer's obligations to promote equality were specified further and the obligation to assess equality also in recruitment was increased.

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27 Paanetoja, Sosiaali- ja terveysministeriön raportteja ja muistioita 2019:20, <https://julkaisut.valtioneuvosto.fi/handle/10024/161425>

28 Nevala, N., Pehkonen, I., Teittinen, A., & Vesala, H. T. (2018). Kehitysvammaisten toimintakykyyn ja työllistymiseen sekä sitä estävät ja edistävät tekijät. Kela.

## Process indicators

In accordance with Prime Minister Petteri Orpo's Government Programme, the Government promotes the appreciation of persons with disabilities and persons with partial work ability as full members of working life. The government's objective is to strengthen the absorption capacity of working life so that, for example, the employment of persons with partial work ability, immigrants, the elderly and people working in low-level positions is improved. The necessary measures will be examined and a development programme will be drawn up. The Ministry of Economic Affairs and Employment is responsible for the planning and implementation of the programme. Promoting the employment and working life inclusion of persons with disabilities is one part of this programme.

The Government aims to raise awareness of the employment opportunities of persons with disabilities. The Government will develop support for arranging working conditions and increase its recognition by employers and TE experts. The aim is also to create incentives for employers to offer work to persons with disabilities. In addition, the operating conditions of entrepreneurs with disabilities will be improved.

Well-functioning employment and economic development services are at the centre of the efforts to find employment for persons with disabilities as quickly and smoothly as possible. A historically great reform is currently being prepared, in which TE services will be transferred to municipalities on 1 January 2025. The reform is an important part of the government's employment measures as a whole. The objective is to organise employment services so that they support the vitality and competitiveness of municipalities and regions as efficiently as possible, increase employment and use the many opportunities offered by the municipal ecosystem: employment will be made more efficient as employment services, municipal education services and business services are the responsibility of the same organiser. The Ministry of Economic Affairs and Employment is responsible for the general steering, development and supervision of employment services as well as for monitoring and evaluation. During each Government term, the Government will set national targets for promoting employment, and a national advisory board for promoting employment will be appointed in connection with the Ministry of Economic Affairs and Employment (section 22 of the Act on Organising Healthcare and Social Welfare Services).

The Government aims at a good working life. The Government promotes gender equality and non-discrimination in working life. It wants to eliminate all forms of discrimination in working life. One of the Government's objectives is to implement

an action plan that increases the participation in working life of underrepresented groups, such as persons with disabilities, the Roma and different immigrant groups. In addition, the Government will eliminate discriminatory practices and structures in working life by promoting compliance with legislation on discrimination through more effective information.

There are no accurate statistics on the employment of persons with disabilities in Finland. Finland does not maintain a register that unambiguously indicates the number of persons with disabilities who are in working life or unemployed. This makes it difficult to monitor the employment of different persons with disabilities and to assess and monitor policy measures. EU statistics on income and living conditions, Kela's statistics and THL's reports all give slightly different figures on the employment of persons with disabilities. Overall, the employment rate of persons with disabilities is estimated to be around one third of the average population. A survey conducted by the Finnish Disability Forum and the Human Rights Centre (2018) estimated the employment rate of persons with disabilities to be 20%.

The commission has called on the member states to set targets by 2024 for increasing the employment rate of persons with disabilities and reducing the employment gap. In addition, the European Court of Auditors highlighted shortcomings in statistics on persons with disabilities in its report. Information on the extent of employment of persons with disabilities is important for planning the measures required for a high employment rate.

The objective of the Work ability programme in Prime Minister Marin's Government Programme (2019–2023) was to make use of the existing work ability of individuals by supporting work ability and functional capacity and employment and by preventing incapacity to work. The programme aimed to increase the preconditions for employment, work ability, functional capacity and social inclusion of unemployed persons with partial work ability. In addition, the aim was to create a multidisciplinary service package in which the need for support for the work ability of unemployed persons with partial work ability is identified and in which services and service paths function in a customer-oriented manner.

According to the assessment carried out in the work ability programme and a follow-up study, clients of work ability support felt that the services had mainly met their needs well. Customers often had prolonged unemployment, health and work ability deficits and the use of unemployment and sickness benefits as background factors. The service reached people who were outside services supporting work ability and employment. The work ability support teams of the social welfare and health care services were implemented in a multidisciplinary and multiprofessional

manner. The partners included, for example, TE services and Kela. As part of the programme, it was noted that long-term job coaching for subsidised employment aimed at finding employment in social welfare is a necessary and effective method for employing persons with disabilities. For disabled customers, job coaching was also supported by the customer relationship with services for the disabled.

The establishment of support services for work ability in social and health care centres is now important in order to ensure that the positive development of multidisciplinary services is not interrupted. This deployment work is supported by Finland's sustainable growth programme, which brings support services for work ability to new areas and at the same time enables national development (expansion of the Work ability programme). The Ministry of Social Affairs and Health has granted EUR 4.5 million in discretionary government transfers for the use of six wellbeing services counties for the period 2023–2024.

As part of the sustainable growth programme, a digital service (Omavire) will be developed for self-assessment of work ability and functional capacity. During 2024, the different functionalities of Omavire will be implemented and transferred to production in stages. The service will be piloted in wellbeing services counties in quarters 2–4.

In accordance with the entry in Orpo's Government Programme, a new work ability programme is being planned (also in cooperation with the MEAE). As part of the programme, attention will also be paid to the strengthening of quality-based job coaching, for example in social and disability services, and to employer cooperation in order to improve staying at work and to create new jobs for the unemployed and persons with partial work ability with disabilities. The measures would start in 2025.

## Outcome indicators

One of the main obstacles to the employment of persons with disabilities is discrimination in working life. According to the Non-Discrimination Ombudsman's annual report (2022), the highest number of contacts related to discrimination was based on disability. According to the fundamental rights barometer published by the Ministry of Justice in 2021, 39% of persons with disabilities reported having experienced discrimination at work or in job-seeking in the past five years.

According to the employment service statistics of the Ministry of Economic Affairs and Employment, the number of unemployed jobseekers with disabilities or long-term illnesses was approximately 30,500 at the end of November 2023. This number

has remained fairly stable over the past few years. The figure increased slightly as a result of the COVID-19 crisis, but has returned to the 2018 level in 2023. It should be noted that health information can only be recorded in the TE office's customer information system if a long-term illness or injury undermines the customer's ability to find a job, choose their occupation or advance on their career.

The number of persons with disabilities and long-term illnesses registered in the TE Office's customer information system does not describe the entire target group. In a broad sense, the target group would also include those persons who have not registered as jobseekers for one reason or another. Unemployed persons receiving a disability pension who are not actively looking for work at all, or do not do so through the TE Services, are another special group. There are indications, at least indirect ones, that those participating in work and other activities regulated under the Social Welfare Act or in services referred to in the Act on Intellectual Disabilities have often not registered as jobseekers.

The client numbers of the work activities of persons with intellectual disabilities are recorded together with the work activities referred to in the Social Welfare Act. According to the Finnish Institute for Health and Welfare, there were 8,595 people in these work activities on 31 December 2022. Customers of activities that maintain and promote functional capacity organised by work and activity centres are included (customers of activities referred to in section 27e of the Social Welfare Act and customers of activities referred to in section 2(4) of the Act on Intellectual Disabilities). On 31 December 2022, there were 1,818 persons in activities supporting the employment of persons with disabilities (customers of activities referred to in section 27d of the Social Welfare Act).

Summary of the results of the report "Uncertainty and variable inclusion", Work and employment:

*"In the case of many persons with disabilities, the right to work equally with others is not realised at the moment. Approximately 40% of the respondents had experienced discrimination in job seeking during the past 12 months. Correspondingly, 34% of the respondents reported discrimination at their workplace during the past 12 months. More than 60% of the respondents estimated that the right of persons with disabilities to receive and work on an equal basis with others was realised poorly or fairly poorly in Finland. Based on the open-ended responses, it was almost impossible for people with intellectual disabilities to find employment in the open labour market. In particular, the low level of work component allowance was seen as a problem for work activities aimed at people with intellectual disabilities."*

## Fostering equal employment and access to work: objectives and measures

**Objective: Secure the competence of different authorities and effective multidisciplinary cooperation in services promoting the employment of persons with disabilities.**

**Measure:**

49. Review existing training material and training practices and produce training material in cooperation with relevant parties.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH and MEAE

**Objective: Develop support for arranging working conditions and increase its recognition by employers and TE experts.**

**Measure:**

50. The use of support for arranging working conditions has been limited, partly because the support and its uses are not sufficiently well known. Investigate the coverage of the arrangement support and other services promoting the employment of persons with disabilities, and develop the arrangement support on the basis of the development needs obtained in the investigation. If necessary, training material and service descriptions for employers will also be produced.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

**Objective: Investigate the disability quota as part of the Ministry of Economic Affairs and Employment's survey of the models used in different European countries to support the hiring of people with challenging employment opportunities.**

**Measure:**

51. Review existing reports and research data on European disability quota models.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

## 4.11 Adequate standard of living and social protection (Article 28 of the UNCRPD)

Persons with disabilities must be ensured an adequate standard of living and social protection for themselves and their families. Their right to adequate food, clothing and housing must be recognised. Ensuring access to affordable services, devices and other assistance for disability-related needs is the key.

### Structural indicators

Social security in Finland consists of benefits, allowances and services that secure citizens' income. Legislation on income security includes the Health Insurance Act (1224/2004), the Act on Social Insurance Institution of Finland's Rehabilitation Benefits and Rehabilitation Allowance Benefits (566/2005), the Disability Benefits Act (570/2007), the National Pensions Act (568/2007), the Act on Guaranteed Pension (703/2010), the acts on earnings-related pensions, the Occupational Accidents, Injuries and Diseases Act (459/2015), the Motor Liability Insurance Act (460/2016), the Unemployment Security Act (1290/2002), the Act on General Housing Allowance (938/2014), the Act on Housing Allowance for Pensioners (571/2007), the Act on Social Assistance (1412/1997), the Act on Financial Aid for Students (65/1994).

The Disability Benefits Act (570/2007) contains provisions on disability benefits, the purpose of which is to support persons with disabilities or long-term illnesses who live in Finland with coping in daily life, participation in work or studies and

maintaining their functional capacity, living at home, rehabilitation and care. Disability benefits include disability allowance for persons aged under 16, disability allowance for persons over 16, care allowance for pensioners and a disability supplement for war veterans included in the care allowance.

In its decision of 15 February 2023 regarding complaint no. 172/2018, the European Committee of Social Rights stated that the level of social security in Finland is too low to cover the basic needs of beneficiaries in accordance with the revised European Social Charter. Finland has also received earlier criticism from the social rights committee for the insufficient level of basic security.

## Process indicators

On the basis of the Government Programme and the general Government Fiscal Plan for 2025–2028, several changes to social security legislation have been and will be implemented, the main objective of which is to strengthen general government finances and employment. The changes concern, for example, Kela's rehabilitation allowances, disability pension of the national pension system, disability benefits, sickness allowance, unemployment security, child benefit, pensioner's housing allowance, general housing allowance, social assistance, annual personal liability for pharmaceutical reimbursements, i.e., so-called medicines ceiling, adult education benefits and social security index freezes. However, social security index freezes exclude social assistance, disability benefits, front-line supplements, pensions and maintenance allowance. Changes to benefits and subsidies will take effect in stages. A wide range of feedback has been received from disability organisations during the consultation rounds of the draft government proposals.

The Government Programme also contains an entry on the moderate increase in client fees in public health care, which aims to adjust a total of EUR 50 million in general government finances. The purpose of the increase is to contribute to strengthening general government finances and thus the economic sustainability of the wellbeing services counties in the provision of equal services. According to the Government Programme, the intention is to implement the increases from the beginning of 2025. According to the Government Programme, the increase in client fees will be implemented with the emphasis on specialised medical care as fairly as possible and without increasing inequalities so that the fees do not prevent access to services.

In the spending limits negotiations on 15–16 April 2024, additional savings targets of EUR 100 million were also decided on, which are to be implemented through increases in customer fees. The aim is to implement the additional savings by raising the maximum amounts of client fees in both basic and specialised medical care, while emphasising specialised medical care in accordance with the Government Programme.

The preparation of a linear model for reconciling disability pensions and work earnings was interrupted during the last government term due to the dissenting views of labour market organisations.

The current Government Programme includes an entry on the introduction of a linear model, cost-effective for public finances, for partial disability and full disability pension that supports the reconciliation of pay and pension so that work is always worthwhile. In addition, the Government Programme contains an entry on the permanentisation of the provision on putting disability pension on hold while working.

In accordance with the Government Programme, background preparation for the linear model has begun. The need to permanentise the on-hold provision will be assessed later.

The parliamentary social security committee will continue its work during Prime Minister Petteri Orpo's term of office. The term of the social security committee is 23 March 2020–31 March 2027. During its first term, the social security committee prepared an interim report containing 31 committee proposals for future governments to reform social security and the outlines for the work of the committee for the second term. The interim report was published in early 2023 and was circulated for comments.

The task of the social security committee is to make proposals and initiatives for the reform of social security, and to carry out preliminary studies and evaluations on them. The committee outlines the vision and principles of future social security. It examines basic security, earnings-related income security, minimum support, the links between them and their funding, in addition to better integration of services and benefits. The work takes into account the diversity of life situations and their changes as well as the transitions from one benefit to another.

The social security committee will discuss the individual and family-specific nature of benefits, combinations of benefits and the level of social security during its second term, which began in autumn 2023. In addition, the committee assesses

how different benefits and services respond to different life situations. In this context, benefits and services related to work ability and disability are examined. The committee also monitors the progress of the preparation of the general benefit.

In order to secure the participation of persons with disabilities and their possibility to exert influence, the Finnish Disability Forum is represented in the permanent experts of the social security committee.

## Outcome indicators

Summary of the results of the report "Uncertainty and variable inclusion"<sup>29</sup>,  
Sufficient standard of living and social security:

*"For many respondents, poverty is a shared experience that can have a significant negative impact on mental health. Despite the fact that the respondents to the survey were presumably more well-off persons with disabilities than average, 19% of the respondents had applied for social assistance in the past 12 months. In addition, only 34% of the employed respondents stated that their income is sufficient always, and as many as 42% of unemployed respondents responded that their income is basically insufficient for living. Insufficient financial support and additional disability-related costs are key challenges for many respondents."*

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29 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

## Fostering an adequate standard of living and social protection: measures and objectives

### **Objective: Development of social security for persons with disabilities.**

#### **Measure:**

52. In the reform of social security, the life situations of persons with disabilities is taken into account. The reform ensures the inclusion of persons with disabilities and organisations representing them, and assesses and monitors the impacts on persons with disabilities, children, young people and families.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

### **Objective: Develop the identification of the customers' benefit and service needs and the comprehensibility of decisions.**

#### **Measure:**

53. a) Kela is in the process of a trial across benefit limits in relation to young people, students and families with children. The aim is to develop the comprehensive identification of the benefit and service needs of the customer groups in question and thus to actively cooperate across Kela's benefit limits. Other customer groups will be included in the trial in stages.

b) Develop the comprehensibility of benefit decisions related to work ability and functional capacity.

*Schedule:* during the Action Plan period and ongoing

*Responsible body:* Kela

**Objective: Develop and streamline the implementation of disability benefits.**

**Measure:**

54. a) Investigate the possibilities of improving the application form for disability allowance for persons under the age of 16 in the respect that it would be easier to describe the burden and being bound on the form.
- b) Strive to facilitate the application for disability benefits by increasingly granting longer benefit periods where possible, thus reducing the need to submit further applications for benefits.
- c) Develop acting on behalf of another person in OmaKela.
- d) Make increasing use of automation in identifying customers' benefit and service needs.
- e) Investigate the possibility of removing the term "fault" (vika) from disability benefit legislation.

*Schedule:* during the Action Plan period and ongoing

*Responsible body:* Kela

## 4.12 Participation in cultural life, recreation, leisure and sport (Article 30 of the UNCRPD)

Persons with disabilities are entitled to participate in cultural life, and develop their creative, artistic and intellectual potential and understanding. Ensuring the accessibility of facilities and services as well as equal opportunities for participation are essential.

Persons with disabilities are entitled, on an equal basis with others, to recognition and support of their specific cultural and linguistic identity, including sign languages and deaf culture.

## Structural indicators

Art and culture experiences are important to all of us. The International Covenant on Economic, Social and Cultural Rights recognises everyone's right to participate in cultural life. It is important to ensure that persons with disabilities have the right to participate in cultural life and to develop their creative, artistic and intellectual abilities and understanding regardless of obstacles.

It is essential to ensure the accessibility of facilities and services and equal opportunities for participation so that accessibility is realised as extensively as possible in all areas.

The cultural, sports and youth sectors in Finland are based on a strong and vibrant civil society. The Ministry of Education and Culture plays an important role in maintaining and developing culture and art. The aim is to ensure that everyone has equal opportunities to participate in culture and to promote their creativity in an equal manner.

The Act on the Provision of Digital Services (306/2019) applies to sports, youth and cultural policy. In addition to this Act, current statutes that promote the possibilities of persons with visual impairments and other print disabilities include the EU Print Disabled Directive (EU) 2017/1564 and the EU Accessibility Directive (EU) 2019/882. The Celia library of accessible literature, which operates in the administrative branch of the Ministry of Education and Culture, is an expert centre that supports equality in reading and learning by providing services for persons with visual impairments and other reading disabilities.

The Ministry of Education and Culture is responsible for the general direction, coordination and development of sports policy and youth work and policy, and for creating the general preconditions for physical activity. When granting grants, the ministry takes into account that the applicant complies with the Non-Discrimination Act (1325/2014), the Equality Act (609/1986), the Youth Act (1285/2016) and the Sports Act (390/2015). In practice this means that, among other things, the ministry takes into account compliance with these Acts when disbursing grants.

The Ministry of Education and Culture requires organisations promoting physical activity to submit equality and non-discrimination plans in connection with the organisations' application for operating grants. The ministry assesses and monitors the quality and development of the plans. The plans affect the amount of the grant to be granted.

The Ministry of Education and Culture requires that the foundation projects of sports facility construction, for which discretionary government transfers are granted, meet the requirements for accessibility. In addition, the implementation of the special requirements for parasports are taken into account. The Ministry of Education and Culture assists research and development projects in the construction of sports facilities, which produce instructions on accessibility solutions for sports facilities.

The MEC-appointed Advisory Board for sport-related ethical matters serves as a coordination and cooperation body between different administrative branches and sports sector actors. The Advisory Board now operates in its third period (2023–2027). Promoting non-discrimination is one of the ethical questions in sport that the Advisory Board discusses regularly. The members of the Advisory Board include the Finnish Paralympic Committee, the Finnish League for Human Rights and SETA – LGBTI Rights in Finland.

One of the objectives set out in section 2 of the Youth Act (1285/2016) is promoting equality, non-discrimination and the realisation of rights among young people. Under the Act, the promotion of equality (including the rights of persons with disabilities) is taken into account in principle and in addition to the provisions of the Non-Discrimination Act in all promotion of youth work and activities and in youth policy, as well as in the responsibilities and cooperation of the central and local government and in central government funding within the scope of the Act. Section 1 of the Youth Act contains a separate provision stating that, in addition to the provisions laid down in the Youth Act, international obligations binding on Finland (including UNCRPD).

According to section 5 of the Government Decree issued under the Youth Act, when assessing the eligibility for state aid of national youth organisations, consideration is given to how the promotion of equality, non-discrimination and inclusion is realised in the organisation's internal activities and socially through the objectives of the organisation and the measures implemented by it, and how accessible the organisation's activities are from the perspective of young people belonging to different groups. The ministry also monitors whether national youth sector organisations receiving grants have valid equality plans, non-discrimination plans or their combinations.

With respect to culture policy, the role of the Ministry of Education and Culture is to take care of legislation, the administrative structure and practices, financing, strategic steering and other general prerequisites and their development. Promoting inclusion through culture and lowering the thresholds for cultural participation are key objectives of cultural policy.

When granting discretionary government transfers, the Ministry of Education and Culture takes into account compliance with the equality and non-discrimination acts. From 2025 onwards, the Ministry of Education and Culture aims to introduce assessment criteria on the responsibility of operations in the application process for general grants for national communities in the field of art and culture. In this context, it is also possible to pay attention to promoting equality and accessibility.

## Process indicator

The objective of the Taiku 4 cooperation group appointed by the Ministry of Education and Culture and the Ministry of Social Affairs and Health (2023–2027) is to promote and coordinate cooperation between national-level actors in social and health care and culture and arts in the development of cultural well-being services and to increase societal awareness of the impacts of culture and art on well-being.

The Ministry of Education and Culture prepared an action plan to promote the diversity of art and culture in 2023. In order to implement the Action Plan, monthly online clinics for officials and other cultural sector actors were launched, led by the Culture for All service.

Public libraries have particular significance when it comes to promoting the cultural rights of persons with disabilities. The objective of the Public Libraries Act is to promote the population's equal opportunities for education and culture, access to and use of information, culture of reading and versatile literacy, possibilities for lifelong learning and competence development as well as active citizenship, democracy and freedom of expression. The Ministry of Education and Culture supports the activities of the Finnish Association of the Deaf with annual discretionary government transfers.

The act on the Celia library of accessible literature, which replaced the previous Act on the Library of the Visually Impaired, entered into force at the beginning of 2023. The reform of the Act secured the library's task of promoting the equality of persons with visual impairments and other reading-impaired persons in society

through its services also in the future. The Arts Promotion Centre, which operates in the administrative branch of the Ministry of Education and Culture, offers an annual grant for the promotion of inclusion and cultural well-being.

Each year, the Ministry of Education and Culture grants project grants to the Finnish Centre for Easy Language that operates under the Finnish Association on Intellectual and Developmental Disabilities and promotes easy read literature and further distributes production support to authors of easy read books. More than 10% of the population need easy read language, and the number is increasing. In child culture activities, the MEC has supported the accessibility of art hobbies for children and young people in need of special support, such as the SATA2 project (2018–2019)<sup>30</sup> and the Saavutettava Harrastamisen Suomen malli project for accessible hobbies in Finland (2023–2024) Saavutettava Harrastamisen Suomen malli - lastenkulttuuri.fi

The Harrastamisen Suomen malli model promotes the equal opportunities of children and young people, including children and young persons with disabilities, to pursue enjoyable and free hobbies in connection with the school day. Each year, the Ministry of Education and Culture grants Harrastamisen Suomen malli grants to municipalities for hobbies.

Prime Minister Orpo's Government Programme does not contain a direct reference to promoting sports for persons with disabilities. However, the Government Programme emphasises equal opportunities for physical activity and safe hobbies for everyone. A precondition for putting the integration of physical activity for persons with disabilities into practice is extensive proactive measures rather than merely intervention in cases of discrimination. Taking the obligation to promote physical activity for persons with disabilities into account in all activities of the sports sector and in the distribution of grants is the key.

The Schools on the Move programme has coordinated projects supported by the Ministry of Education and Culture to promote physical activity during the school day. The projects funded have also included contents that promote the mobility of pupils in need of applied physical activity or special support, including the Iloon yli esteiden project implemented by Valteri centre for learning and consulting, which was implemented in schools as part of the Schools on the Move programme in 2018. Its objective was to provide every pupil, without forgetting those in need of special support, with more opportunities to participate in physical activity

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30 <https://www.lastenkulttuuri.fi/sata2/>

during the school day, including PE classes, action-based teaching and recesses. The project produced a pool of ideas whose contents have been introduced in comprehensive schools.

The 2023 project network has included, for example, the project Liikkuminen osana varhaiskasvatuksen kolmitasoista tukea, which provides three-tier support in early childhood education and care for mobility, from the Lasten Liikunnan Tuki association for the mobility of children. The project will pilot a model in which the school's practical nurse and child counsellor students will be offered a genuine learning environment for monitoring and implementing the use of physical activity as a means of general support. The project has also organised webinars for ECEC professionals. The communication of the Schools on the Move programme has highlighted support for pupils in need of support. For example, the Liikkuva ja oppiva podcast on mobility and learning, published in 2023, considered what matters are important in considering the physical activity of children with different functional capacities. Expert guests explained how they would get started in their own work if the group has a child in need of special support.

The handbook on inclusion in physical activity (thesis) produced by the Liikkuva varhaiskasvatus network for mobility in early childhood education and care has been disseminated through national communications, networks and seminars. The content is based on supporting inclusion in physical activity, which refers to activities that promote physical activity that are suitable for everyone and promote each child's opportunities to move as part of high-quality basic activities of early childhood education and care.

Taking equality into account is cross-cutting in all Liikkuvat activities. Support material has been produced to support the matter, for example, for the Liikkuva opiskelu programme coordinators, which can be used to examine the theme in various everyday activities and in the planning and implementation of services that support mobility, especially for students.

The National Youth Work and Youth Policy Programme (VANUPO) is a cross-administrative programme decided on by the government, adopted for four years at a time. The theme of the current programme approved for 2024–2027 is "Strengthening young people's wellbeing through multidisciplinary measures". VANUPO promotes the realisation of equal opportunities for all young people, and the different starting points, origins and functional capacity of young people are taken into account in its implementation. The measures included in the programme include piloting youth participation structures in central government. Measures promoting the hearing of young people take into account, in particular, equal

opportunities among young people belonging to different groups, clear language and multi-channel communication. The measures create an atmosphere in which everyone's actions promote equal, respectful and open discussion. The Youth Act includes provisions on approving the eligibility of national youth work centres of expertise for state subsidies and their funding.

The Ministry of Education and Culture supports activities related to young people belonging to minorities, for example through general grants for youth sector organisations and through various special grants, which vary annually depending on the project applications submitted by the organisations. Non-discrimination is an important indicator of assistance in youth work and policy appropriations.

## Outcome indicators

The Finnish Foundation for Cultural Policy Research Cupore, which is co-funded by the Ministry of Education and Culture, produced a report titled *Yhdenvertainen kulttuuri!* ('Equal Culture!') commissioned by the ministry in 2017. The report focuses on discretionary government grants for the cultural activities of communities of persons with disabilities and for promoting the accessibility of culture. While the report shows how public support has been a prerequisite for the preservation and development of cultural activities in the communities of persons with disabilities and for increasing the provision of art and cultural services accessible to persons with disabilities, it also draws attention to the inadequacy of the support and its uneven allocation.

The National Sports Council carried out the Schools on the Move evaluation in spring 2019.<sup>31</sup> Promoting pupils' participation in the planning and implementation of the activities, which was one of the aims of the programme, has been realised reasonably well. The evaluation found that the pupils' participation, especially when it comes to assessing the Schools on the Move activities, needs to be developed in municipalities and schools. The available data did not enable an extensive evaluation of whether the participation of the least physically active groups or special groups has increased in schools. The data indicated that there are local variations in the attention given to special groups and minorities. A key objective of the Schools on the Move programme is to support the participation of all pupils and thus strengthen inclusive activities in schools and projects.

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31 Valtion liikuntaneuvoston julkaisuja 2019:4.

In spring 2021, the National Sports Council carried out a report on the situation of applied physical activity in municipalities.<sup>32</sup> The study showed that the needs of persons with disabilities vary strongly depending on the living environment and the limitations caused by injuries and illnesses. Many people in the target group have several limitations, and it would seem to be more challenging for them to use physical activity services. On the basis of the report, the level of resources in municipalities and the number of groups of organisers with the main responsibility remained broadly unchanged in 2019 compared to the previous years.

Summary of the results of the report "Uncertainty and variable inclusion"<sup>33</sup>, Culture, recreation and leisure activities and sports:

*"Persons with disabilities are not in an equal position with the rest of the population in terms of leisure time inclusion. The realisation of the right to participate in cultural, recreational and leisure activities and physical activity is the poorest for people under the age of 17, with disabilities, the majority of whom are unable to participate in cultural and leisure activities that interest them. It is noteworthy that 64% of respondents aged 13–16 and as many as 78% of respondents aged under 13 were unable to have meaningful physical activity and sports as their hobby. For many respondents, physical obstacles at sports and culture premises limit having sports or culture as a hobby. For some, factors limiting hobbies and engagement in leisure time are shortcomings or inadequacies in disability services and interpretation services, such as the amount of personal assistance, the availability of sign language interpretation and aids. The participation may also be hindered by deficiencies in the provision of recreational opportunities according to needs (e.g. special exercise groups or recreational groups). In summary, persons with disabilities also encounter the accumulation of various obstacles in their leisure time and the opportunities for participation are influenced by the accessibility of sports and cultural facilities, the provision of needs-appropriate recreational opportunities and regional variation in these, as well as the realisation of services for the disabled in accordance with their needs."*

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32 Valtion liikuntaneuvoston julkaisu 2021:3.

33 Katsui, Mietola, Laitinen, Honkasilta and Ritvaniemi: Epävarmuutta ja vaihtelevaa osallisuutta. Selvitys ihmisoikeuksien toteutumisesta vammaisten henkilöiden arjessa. University of Helsinki, Helsinki; available online at <https://tuhat.helsinki.fi/ws/portalfiles/portal/283164457/loppuraportti.pdf>

## Fostering participation in cultural, recreational and leisure activities and sport: objectives and measures

### **Objective: Assessment of the organisation and status of parasports in Finland**

#### **Measure:**

55. In Finland, elite sport has been assessed several times in the past decade, but parasport has not been taken into account thoroughly in the evaluations. The assessment produces an overall picture of the structures and organisation of parasports in Finland and assesses the functionality and effectiveness of the system. The assessment also examines the current state of the integration with sports federations. The evaluation produces development and action proposals for central government, the Finnish Paralympic Committee, the Finnish Olympic Committee and its elite sports unit, sports academies, KIHU and sports federations to develop parasports in Finland.

*Schedule:* evaluation to be completed in September 2024

*Responsible body:* MEC

### **Objective: Examine municipal services for applied physical activity.**

#### **Measure:**

56. Systematic analysis of applied physical activity services has been carried out approximately every four years since 2000. The previous report on municipal applied physical activity services applies to 2019. The report examines, among other things, the arranging/organisation of municipal services for applied physical activity and its position in the municipality, resourcing, services offered, support for organisations and sports conditions. Based on the results of the report, general and field-of-education-specific development recommendations for the education sector will be drawn up, which will enable better promotion of physical activity in education programmes.

*Schedule:* the report will be completed in August 2024

*Responsible body:* MEC

**Objective: Promoting the possibilities of persons with disabilities to participate in art and cultural activities.**

**Measures:**

57. Support the art and cultural activities of national disability organisations and communities by granting discretionary government transfers and support the availability and accessibility of art and culture.
58. Sustainability criteria (including the promotion of equality) will be introduced in the granting of community grants in the MEC's arts and culture sector.

*Schedule:* Action Plan period

*Responsible body:* MEC

**Objective: Take persons with disabilities and their special needs into account in the implementation of the Suomi liikkeelle mobility programme.**

**Measure:**

59. Take persons with disabilities into account in all mainstream measures under the Suomi liikkeelle mobility programme and implement targeted measures when funding is secured.

*Schedule:* 2024-2027

*Responsible bodies:* MEC and other ministries responsible for the measures under the Suomi liikkeelle mobility programme

**Objective: Improve the competence and methods of recreational service providers to develop the accessibility and usability of local nature.**

**Measure:**

60. Update the accessibility guidelines related to routes and structures on the basis of the Paralympic Committee's recommendations on accessible routes and structures in Metsähallitus's public building drawing collection.

*Timetable:* Subject to enablement by the 2025 funding, the development project of Metsähallitus's public building drawing collection project

*Responsible body:* MEC, ME, Metsähallitus

**Objective: Raising awareness of the accessibility of cultural activities.**

**Measure:**

61. Support national communities that provide information and support on accessibility and diversity issues.

*Schedule:* Action Plan period

*Responsible body:* MEC

**Objective: Promoting accessible library services.****Measure:**

62. During the performance agreement period 2024–2027, the Celia library of accessible literature will strengthen the abilities and competences of children and young people and their participation in culture by developing and offering materials, products and services suitable for children and young people with reading disabilities and by promoting cooperation between libraries and schools. The availability and customer orientation of the digital library services, including the listening application, offered by the Celia library of accessible literature will be improved.

*Schedule:* Action Plan period

*Responsible body:* MEC in cooperation with Celia library of accessible literature

## 4.13 International cooperation (Articles 11, 32 and 33 of the UNCRPD)

The rights of persons with disabilities must also be ensured in situations of risk, including situations of armed conflicts humanitarian emergencies and the occurrence of natural disasters. The participation of persons with disabilities in international cooperation must be supported. Capacity-building must be supported, including through the exchange and sharing of information, experiences, training programmes and best practices internationally.

### Structural indicators

Promoting and realising the rights of persons with disabilities is one of the cross-cutting objectives of Finland's human rights and development policy. The aim is to increase the participation of persons with disabilities in political decision-making, both in Finland and internationally, to strengthen the international disability rights movement and promote the fundamental rights of persons with disabilities.

The rights of persons with disabilities are taken into account as part of international efforts to promote human rights by the EU, the UN, the Council of Europe, OSCE and other international organisations. This includes promoting the rights of persons with disabilities, including in speeches, resolution negotiations and the organisation of events. The rights of persons with disabilities are one of Finland's priorities in the UN Human Rights Council, of which Finland will be a member in 2022–2024. Finland supports the participation of NGOs, including disability organisations, in various UN forums. The rights of women and girls with disabilities and the implementation of the UN Disability Strategy (UNDIS) are important for Finland. Finland is additionally an active member of the Global Action on Disability (GLAD) network<sup>34</sup>.

Finland's OSCE presidency in 2025 offers a good opportunity to promote the rights of persons with disabilities, and the theme will be taken into account in the preparations for the presidency.

The views of persons with disabilities and the organisations that represent them are taken into account when formulating Finland's policies. Hearings are held within the framework of the coordination group for international disability policy led by the Ministry for Foreign Affairs, for instance.

Both the European Union (EU) and all its member states have adopted the UN Convention on the Rights of Persons with Disabilities, and strengthening its implementation is a common goal. The Convention on the Rights of Persons with Disabilities entered into force for the EU in 2011. The EU is committed to the Convention in its areas of competence, as further specified in the declaration on the Union's competence in matters covered by the Convention, annexed to the decision. The union exercises shared competence with the member states in the fight against discrimination on the grounds of disability, in matters pertaining to the free movement of goods, persons, services and capital, agriculture, rail, road, maritime and air transport, taxation, the internal market, equal pay for men and women and statistics, and in the policy on trans-European networks.

As part of the implementation of the EU Strategy for the rights of persons with disabilities, the commission has established a Disability Platform. The members of the forum are the national focal points of the UN Convention on the Rights of

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34 GLAD works to enhance the inclusion of persons with disabilities and supports the implementation of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) globally. The organisation's activities include advocacy, information sharing and coordination of the actions and positions of different donors.

Persons with Disabilities from all EU member states. In addition, members include EU-level NGOs, representatives of EU institutions and a representative of service providers for persons with disabilities. In addition to EU legislation, EU-level measures in disability policy can support national measures and promote the exchange of information and experience between member states.

In Nordic cooperation, the inclusion of persons with disabilities is one of the important objectives. The Council of Nordic Cooperation on Disability is an advisory body of the Nordic Council of Ministers that supports different policy areas and all Nordic cooperation in promoting this inclusion. The council has 16 experts, half of whom are appointed by the Nordic governments and half by disability organisations.

## Process indicators

Finland's first periodic report on the implementation of the UN Convention on the Rights of Persons with Disabilities was issued on 9 August 2019. This report was prepared by the Ministry for Foreign Affairs in cooperation with various ministries and other key authorities. The participation of organisations representing persons with disabilities was taken into account as set out in Article 4(3) of the Convention.

The preparation of the periodic report was launched in September 2017 at a discussion event organised by the Ministry for Foreign Affairs. The draft report was available for open commenting on the website [www.lausuntopalvelu.fi](http://www.lausuntopalvelu.fi) in March and April 2018. Through this web service, the draft was also directly distributed for commenting to more than one hundred different authorities and NGOs. During the commenting period, the Ministry for Foreign Affairs organised a hearing on the content of the report for authorities and NGOs.

The Government of Åland issued a comprehensive report on UNCRPD implementation in Åland, which was taken into account in the periodic report, and the full report produced by the Government of Åland was published on the Ministry for Foreign Affairs' website.

As set out in the European Union's Code of Conduct between the Council, the Member States and the Commission relating to the United Nations Convention on the Rights of Persons with Disabilities (2010/C 340/08), Finland's draft report was notified to the commission in July 2019.

In September 2023, the working group preparing the sessions of the UN Committee on the Rights of Persons with Disabilities (CRPD) consulted NGOs and the National Human Rights Institution confidentially on the parallel reports submitted by them and approved a list of questions to Finland to supplement and update the information provided in the report. Finland's replies to the committee's questions were submitted on 15 April 2024. Materials related to periodic reporting are available on the website of the Office of the High Commissioner for Human Rights<sup>35</sup>.

The participation of disability organisations in the periodic reporting on the implementation of other key human rights treaties of the UN and the Council of Europe also promotes discussion on the rights of persons with disabilities in the monitoring bodies of the treaties and is reflected in the contents of the conclusions and recommendations adopted on Finland.

In development cooperation, the rights of persons with disabilities are promoted through three primary mechanisms: special projects, mainstreaming as well as political influence and dialogue. Examples of Finland's measures include funding the UN Partnership on the Rights of Persons with Disabilities (UNPRPD) and supporting the work of the UN Special Rapporteur on the Rights of Persons with Disabilities. Finland also funds disability organisations and its own networks in developing countries. The International Disability Alliance, the Abilis Foundation and the Disability Partnership Finland are among the most visible NGOs supported by the Ministry for Foreign Affairs.

Since 2019, performance guidance of disability inclusion has been strengthened by integrating it into development policy priorities, objectives and indicators measuring their achievement. In addition, there is a separate result area related to the rights of persons with disabilities under the priority women's and girls' rights. However, efforts are made to make disability inclusion more extensive than work aimed at promoting women's and girls' rights and gender equality. All development policy results are to be broken down by age, gender and disability, if possible and appropriate.

Among other things, the objectives and funding related to the rights of persons with disabilities are monitored, for example, with the OECD-DAC disability marker and the Ministry for Foreign Affairs' own disability funding marker. In addition, the

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35 [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2623&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2623&Lang=en)

ministry reports on the results to the Parliament once every four years as part of development policy performance reporting. The latest performance report was published in November 2022<sup>36</sup>.

The Ministry for Foreign Affairs supports disability projects from both development cooperation and humanitarian aid funds. For example, Finnish NGOs and their local partners promote the implementation of the rights of vulnerable persons, including persons with disabilities, in their projects. The projects of the organisations promote, for example, learning and income opportunities for children and young persons with disabilities, inclusion and accessibility of services. In addition, the organisations; projects support the objectives, capacity and advocacy work of local actors. Projects focusing on the rights of persons with disabilities are implemented with the support of the Ministry for Foreign Affairs in many less developed and fragile countries, in particular Africa and Asia. With the Russian invasion, Ukraine is Finland's largest single partner country in development cooperation and the recipient country of humanitarian aid. In Ukraine, too, disability-inclusive projects are being implemented both in development cooperation and humanitarian aid. The rights of persons with disabilities and disability inclusion must also be taken into account in the reconstruction of Ukraine.

The aim is to ensure that persons with disabilities have full and meaningful participation in all stages of humanitarian aid activities. In accordance with Finland's policy as a humanitarian aid provider, organisations supported by Finland must take persons with disabilities into account in the planning of humanitarian projects and report on the beneficiaries so that the number of persons with disabilities is itemised. This is supported by the entry in Prime Minister Orpo's Government Programme that Finland will continue to provide humanitarian aid with emphasis on helping the most vulnerable. In humanitarian aid, Finland emphasises both targeted assistance for persons with disabilities and the mainstreaming of disability inclusion. Finland actively engages in exerting influence towards its partners and supports its multilateral partners, where possible, also with funds allocated to disability inclusion.

One of the main achievements of Finland's presidency of the Council of the European Union in 2019 were the council conclusions drawn up at Finland's initiative, in which all EU member states committed themselves to strengthening disability inclusion in humanitarian work and supported the Inter-Agency Standing Committee (IASC) Guidelines on the Inclusion of Persons with Disabilities in

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36 <https://um.fi/web/kehityspolitiikan-tulosraportti-2022/>.

Humanitarian Action<sup>37</sup> published in late 2019. Among other things, these guidelines promote humanitarian actors' common standards on the inclusion of persons with disabilities. Finland has monitored the implementation of the guidelines, which continues to pose significant challenges, especially at the country level. Finland also encourages its humanitarian partners to cooperate with disability organisations.

Finland was the co-chair of the Good Humanitarian Donorship group in 2021–2023. A study was commissioned regarding disability inclusion to survey the actions of Finland's key partners. In Geneva, Finland is one of the co-chairs of the Group of Friends to the Charter on Inclusion of Persons with Disabilities in Humanitarian Action. Finland is additionally an active member of the Global Action on Disability (GLAD) network<sup>38</sup>.

Partly as a result of Finland's advocacy, disability inclusion was identified as one of the priorities for the Pooled Funds administered by the UN Office for the Coordination of Humanitarian Affairs (OCHA)<sup>39</sup>. Finland will continue its advocacy work in relation to the OCHA, which is responsible for coordinating the international humanitarian system. The survey conducted by Finland showed that no official place in the system has been allocated to disability inclusion. Finland strives to exert influence to rectify the situation.

At the 2022 disability summit, Finland made five new commitments to promoting the implementation of the rights of persons with disabilities. These included general advocacy work, better consideration of persons with disabilities in disaster risk reduction and in peace processes, and inclusive teaching. The implementation of the commitments is currently under way. Finland has participated in organising several events on the disability theme together with various UN and disability organisations.

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37 <https://interagencystandingcommittee.org/iasc-task-team-inclusion-persons-disabilitieshumanitarian-action/documents/iasc-guidelines>.

38 GLAD works to enhance the inclusion of persons with disabilities and supports the implementation of the United Nations Convention on the Rights of Persons with Disabilities (CRPD) globally. The organisation's activities include advocacy, information sharing and coordination of the actions and positions of different donors.

39 The UN's Central Emergency Response Fund (CERF) and Country-Based Pooled Funds (CBPFs).

In 2022, the Ministry for Foreign Affairs' international trade department commissioned a report on inclusive trade and persons with disabilities. The aim of the study is to increase knowledge of how international trade can affect the rights and well-being of persons with disabilities in many ways. In 2023, the Ministry for Foreign Affairs commissioned a report on how disability inclusion could be promoted in international climate and biodiversity negotiations and in cooperation with climate finance recipients. Finland has striven to promote disability inclusion in international organisations by funding several Finnish experts, most recently a junior professional officer (JPO) who started in 2023 at the Office of the United Nations High Commissioner for Human Rights (OHCHR).

In autumn 2020, an ambassador for disability inclusion started at the Ministry for Foreign Affairs, working in the entire foreign service. The ambassador's task is to promote the rights of persons with disabilities in Finland's foreign and security policy, economic external relations and development policy.

In accordance with Prime Minister Orpo's Government Programme, the European Union is Finland's most important political and economic framework and community of values. Finland's goal is a globally strong and functional European Union that promotes the safety, well-being and economic interests of its member states and citizens.

In the spring, the European Commission published the EU Strategy for the rights of persons with disabilities for 2021–2030. The aim of the disability strategy is to ensure the full participation of persons with disabilities in society. The key principles of the strategy are equality and non-discrimination.

The strategy is ambitious and broad. It includes seven flagship initiatives, 57 commission initiatives and 23 action initiatives for member states. The strategy emphasises that implementation requires coordinated cooperation at both national and EU level. The content of the strategy covers the key content areas of the UN Convention on the Rights of Persons with Disabilities. The implementation of the strategy also supports the national implementation of the Convention on the Rights of Persons with Disabilities.

Nordic Programme for Co-operation on Disability Issues 2023-2027<sup>40</sup> is a strategic cooperation document of the Nordic Council of Ministers in the disability sector. At the annual level, the Action Plan is coordinated in cooperation with the country that is the chairman of the Nordic Council of Ministers. Finland will hold the presidency of the Council of Ministers in 2025.

## Outcome indicators

The UN Committee on the Rights of Persons with Disabilities only holds two sessions a year. It still has a backlog of states parties' periodical reports to review. There are 191 states parties in total, and processing times have become long. It is likely that Finland's report will only be reviewed in 2026.

The European Court of Auditors' report "Supporting persons with disabilities, practical impact of EU action is limited" states that in reality EU action has only a limited impact on the implementation of the rights of persons with disabilities. However, in recent years, EU legislation has been able to promote accessibility in particular, which has direct impacts on the realisation of the rights of persons with disabilities.

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40 Vammaisalan pohjoismainen yhteistyöohjelma 2023-2027, available online at <https://pub.norden.org/politknord2022-732/#113354>

## Fostering the rights of persons with disabilities in international cooperation: objectives and measures

**Objective: Finland will continue to promote the rights of persons with disabilities in the activities of the EU, the UN, the Council of Europe, the Organisation for Security and Cooperation in Europe (OSCE) and other international organisations.**

**Measure:**

63. Promote the rights of persons with disabilities as part of Finland's foreign and security policy in the EU, the UN, the Council of Europe and the OSCE and, where possible, in the activities of other international organisations. Take the rights of persons with disabilities into account in different policy processes and negotiations. Consult persons with disabilities and organisations representing them when formulating Finland's positions.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Raising awareness of the rights of persons with disabilities and mainstreaming these rights in development cooperation.**

**Measure:**

64. a) Comprehensively consider the rights of persons with disabilities in human rights and humanitarian training organised by the Ministry for Foreign Affairs. These have also been included in training on cross-cutting objectives and the implementation of a human rights-based approach.
- b) Support the activities of NGOs, emphasising a human rights-based approach and taking cross-cutting objectives into account. Require the consideration of the rights of persons with disabilities in project applications.
- c) Continue to develop guidelines and tools that promote the mainstreaming of the rights of persons with disabilities in all forms of development cooperation.
- d) Monitor funding for work with persons with disabilities and communicate that as part of development policy reporting.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Supporting projects that promote the rights of persons with disabilities politically and, as far as possible, financially.**

**Measure:**

65. a) Finland will continue its political and, where possible, financial support for activities supporting the rights of persons with disabilities and will pay particular attention to the implementation of the UN Disability Inclusion Strategy. Continue to support the UN Disability Partnership Fund where possible.
- b) Continue to implement the commitments made at the Oslo Summit on Disability and prepare to make new commitments at the 2025 Summit on Disability.
- c) Promote the meaningful participation of persons with disabilities in the planning, implementation and evaluation of projects.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Promoting the realisation of the rights of persons with disabilities through international advocacy, including steering group work.**

**Measure:**

66. Disability inclusion is one of Finland's priorities in cooperation with UN organisations and the International Red Cross and Red Crescent. Finland strongly highlights disability inclusion in the work of the organisations' boards and, where possible, supports the addition of this as a permanent topic. Finland's priorities also include strengthening the status of women and girls with disabilities, appointing persons responsible for disability issues in organisations and strengthening competence related to the rights of persons with disabilities.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Taking the rights of persons with disabilities into account in humanitarian crises.****Measure:**

67. a) Finland will continue to put emphasis on disability activities in humanitarian crises. As one of the measures, Finland will contribute to the continuation of the UN Disability Inclusion Strategy (UNDIS). Where possible, Finland will annually ask for the UNDIS reports of its key UN partners for review and organise a discussion around them. Finland encourages its partners to publish their reports.
- b) Finland supports the humanitarian work on the disability inclusion of UN and Finnish organisations, including with earmarked support, when appropriate. Finland measures the amount of support allocated to disability inclusion annually.
- c) Finland will contribute to the official adoption of disability inclusion as part of the humanitarian coordination system. The aim is that 1) disability inclusion would be the responsibility of an official coordination system and 2) a UN organisation would be designated as a leading organisation.
- d) Finland also promotes disability inclusion in the country-based pooled funds of the UN OCHA, which it finances.
- e) Finland strives to bring together disability organisations and humanitarian organisations by various means.

*Timetable: Continuous*

*Responsible body: MFA*

**Objective: Promote the rights and engagement of persons with disabilities in peace processes and peacebuilding together with and in consultation with disability organisations. Work to improve the accessibility of peace processes, to take into account the views and needs of persons with disabilities and to increase the engagement of persons with disabilities and their representative organisations in conflict prevention and resolution and peacebuilding.**

**Measure:**

68. a) Supporting practices that increase the inclusion of persons with disabilities in peace processes and dialogues supported by Finland.  
b) Advocacy work among actors in the field of mediation and in cooperation with partners in the field.  
c) Increasing the participation of persons with disabilities in peace mediation training organised and/or funded by Finland.

*Schedule:* continuous

*Responsible party:* MFA

**Objective: Promote the rights and active participation of persons with disabilities and disability organisations in the UN Peace and Security Pillar. Influence the normative work of the UN, such as negotiated resolutions, reports, statements and other documents, to increase the language supporting the rights and inclusion of persons with disabilities. In addition, actively influence exert influence through cooperation with the UN and support possibly given to the UN.**

**Measure:**

69. a) Seek to negotiate a wording that promotes the rights and active participation of persons with disabilities in UN peace and security resolutions and documents, such as in various resolutions on peacebuilding and political operations (SPM) and the report of the Special Committee on Peacekeeping Operations C34.
- b) Support the consideration of the rights and participation of persons with disabilities in wider UN processes such as the 2025 peacebuilding architecture assessment.
- c) In cooperation with the UN, as well as in policies, speeches and statements, emphasise the opportunities of persons with disabilities and disability organisations to participate and influence peacebuilding and other UN activities that promote peace and security.
- d) Promote attention to disability inclusion when implementing the agendas women, peace and security; youth, peace and security and climate and security.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Promote the participation of persons with disabilities in monitoring the implementation of international human rights treaties.**

**Measure:**

70. Support organisations that promote the rights of persons with disabilities in more extensive participation in monitoring the implementation of international human rights treaties, including providing UN treaty monitoring bodies with information on the realisation of the rights of persons with disabilities in each area to which the treaty in question applies, both for the committee's list of issues, the responses to which form the government's periodic report, and as the so-called independent parallel report submitted in addition to the government's periodic report.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Promote the inclusion of persons with disabilities and disability organisations in the review of Finland's first periodic report on the UN Convention on the Rights of Persons with Disabilities and raise awareness of the recommendations made to Finland by the Committee on the Rights of Persons with Disabilities.**

**Measure:**

71. a) Disseminate information about the review of Finland's first periodic report on the implementation of the UNCRPD prior to its consideration by the UN Committee on the Rights of Persons with Disabilities, including about disability organisations' possibility to submit written opinions ("parallel reports"), at the latest four weeks prior to the review, to the committee and to attend a closed hearing of the committee.
- b) Translate the conclusions and recommendations adopted by the UN Committee on the Rights of Persons with Disabilities on UNCRPD implementation into Finland's national languages (Finnish and Swedish).
- c) Disseminate information widely and in an accessible manner on the conclusions and recommendations made to Finland by the UN Committee on the Rights of Persons with Disabilities
- d) Organise a round table discussion on the recommendations made to Finland by the UN Committee on the Rights of Persons with Disabilities.

*Schedule: 2025-2026*

*Responsible body: MFA*

**Objective: Raise awareness of persons with disabilities of the UN Convention on the Rights of Persons with Disabilities.**

**Measure:**

72. a) Support, where possible, the participation of a representative of disability organisations in the annual session of the Conference of the Parties to the UN Convention on the Rights of Persons with Disabilities in New York as part of the Finnish delegation.
- b) Encourage disability organisations to comment on the drafts of general comments produced by the Committee on the Rights of Persons with Disabilities, which comprise the committee's interpretations of the content and application of the Convention's articles.
- c) Distribute with wide circulation the general comments adopted by the Committee on the Rights of Persons with Disabilities.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Strengthening the rights of girls and women with disabilities in international cooperation.**

**Measure:**

73. Finland promotes the rights of women and girls with disabilities in cooperation with UN organisations. Finland encourages organisations to regularly include disability inclusion and, in particular, the promotion of the situation of women and girls with disabilities in board meetings and their activities. Finland cooperates with UNICEF in promoting the rights of women and girls with disabilities, including through the learning innovation and innovative funding centres based in Helsinki.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Ensure effective national implementation of the EU Disability Strategy.**

**Measure:**

74. Distribute information nationally on the EU Disability Strategy and its implementation, especially through the Advisory Board for the Rights of Persons with Disabilities (VANE). Implement the EU Disability Strategy's measures for member states in different administrative branches.

*Schedule:* continuous

*Responsible bodies:* MSAH in cooperation with other ministries

**Objective: Promote the implementation of the UN Convention on the Rights of Persons with Disabilities and the mainstreaming of disability issues through Nordic cooperation in the disability sector.**

**Measure:**

75. In particular, during the presidency of the Nordic Council of Ministers in 2025, the mainstreaming of disability issues in Nordic cooperation will be promoted. During the presidency year, strive to promote the implementation of the UN Convention on the Rights of Persons with Disabilities, in particular by taking into account the strengthening of the knowledge base and the intersectional perspective.

*Schedule:* especially 2025, continuous

*Responsible bodies:* MSAH in cooperation with Finnish Institute for Health and Welfare and other ministries

## 5 Monitoring and evaluation

The implementation of the Action Plan will be monitored by the Advisory Board for the Rights of Persons with Disabilities (VANE) in cooperation with the other responsible bodies and the Finnish Institute for Health and Welfare. Annual monitoring will take place at VANE's meetings.

The participation of persons with disabilities in this monitoring will also be ensured by providing them with an opportunity to assess Action Plan implementation for their part. The monitoring report will additionally assess progress made with the themes brought up by disability organisations at the hearing and the outcome indicators during the Action Plan period. This will also lay a foundation for situational awareness, objectives and measures for the next period.

## Appendix 1. List of objectives and measures

### Fostering inclusion and participation: objectives and measures

**Objective: Ensure the inclusion of persons with disabilities in decision-making concerning them.**

**Measure:**

1. Involve persons with disabilities in the different stages of the preparation of legislative and other projects that concern them. Pay particular attention to diverse and accessible ways of participation and enabling early involvement.

*Schedule:* continuous

*Responsible bodies:* all ministries

**Objective: Promote the inclusion and equality of persons with disabilities.**

**Measure:**

2. Take the diversity and intersectional perspective of persons with disabilities into account, i.e., observe the impacts of different factors on the status and rights of persons with disabilities. Pay particular attention to promoting the rights of Roma and Sámi with disabilities.

*Schedule:* continuous

*Responsible bodies:* all ministries

**Objective: Systematically promote the participation of children with disabilities in children's hearings.**

**Measure:**

3. Develop and strengthen the inclusion and consultation of children with disabilities as part of the implementation of the child strategy and the creation of permanent structures for hearing children and young people in central government, municipalities and wellbeing services counties. This requires a broader understanding and support for different communication methods and the development and introduction of methods of consultation and inclusion suitable for the needs of children with disabilities. Work is carried out together with disability organisations and other stakeholders.

*Schedule:* continuous

*Responsible bodies:* National Child Strategy in cooperation with ministries, wellbeing services counties, municipalities and disability organisations

**Objective: Support the activities of advocacy bodies.**

**Measure:**

4. Establish an informal network to improve cooperation between municipalities, wellbeing services counties, municipal residents and organisations. In addition to the authorities, the network would also include representatives of residents and organisations. A particular focus would be on supporting the work of the advocacy bodies, also in relation to councils for older people and councils for persons with disabilities. Despite the tight spending limits situation, the aim is to implement the network as practically as possible and to benefit different areas. The network would also influence the exchange of information in the municipal and wellbeing services county elections in 2025.

*Schedule:* 2024-2025

*Responsible body:* MF

## Fostering equality: objectives and measures

### **Objective: Assess the impact of projects on the rights of persons with disabilities.**

#### **Measure:**

5. Assess the impacts of legislative and other projects affecting the realisation of the rights of persons with disabilities on the rights of persons with disabilities. Pay particular attention to the obligations of the UNCRPD in the impact assessment. In addition, pay attention to the combined impacts of different projects.

*Schedule:* continuous

*Responsible bodies:* all ministries

### **Objective: The partial reform of the non-discrimination act legislation will be assessed in accordance with the Parliament's statement.**

#### **Measure:**

6. In the assessment of the Non-Discrimination Ombudsman's working life mandate, examine the implementation of the rights of persons with disabilities in particular.

*Schedule:* during the Action Plan period

*Responsible body:* MJ

### **Objective: Implement the truth and reconciliation process for deaf and sign language speakers in cooperation with the sign language community.**

#### **Measure:**

7. The state truth and reconciliation process for deaf and sign language speakers begins.

*Schedule:* during the Action Plan period/ongoing

*Responsible body:* MJ

**Objective: Develop a good discussion culture.**

**Measure:**

8. Set up a network for coordinating a good discussion culture, taking into account speech related to persons with disabilities.

*Schedule:* 2024-2027

*Responsible bodies:* MJ, MI, National Police Board, Police University College, Traficom

**Objective: Persons with disabilities experiencing or threatened by domestic violence receive help from shelter services.**

**Measures:**

9. Increasing the knowledge of shelter staff and other social welfare and health care professionals on persons with disabilities as victims of domestic violence and on the right of persons with disabilities to use shelter services.
10. Improving the accessibility of shelter facilities and promoting reasonable accommodations at shelters.

*Schedule:* continuous

*Responsible body:* THL in cooperation with shelters for victims of domestic violence

**Objective: Promote the right of persons with disabilities to self-determination.**

**Measure:**

11. Continue the work on the legislation on the right to self-determination of clients and patients in order of legal importance and urgency. Ensure that the rights of persons with disabilities are taken into account and that they are included in preparations.

*Schedule:* during the Action Plan period and in further preparation

*Responsible body:* MSAH

## Raising awareness and complementing the knowledge base: objectives and measures

**Objective: The reform of the Disability Services Act strengthens the knowledge and awareness of service providers and producers as well as other actors about the new act, its services and its application.**

**Measure:**

12. Support wellbeing services counties and other actors in the application of legislation by maintaining the Handbook on services for persons with disabilities administered by the Finnish Institute for Health and Welfare. In addition, continue the organisation of THL's Networking services for persons with disabilities and other cooperation and development activities with various parties.

*Schedule:* during the Action Plan period

*Responsible body:* Finnish Institute for Health and Welfare

**Objective: Develop and strengthen the knowledge base related to disability.**

**Measure:**

13. Organise a cross-administrative discussion event to develop statistics and the knowledge base.

*Schedule:* during the Action Plan period

*Responsible bodies:* THL in cooperation with MSAH and VANE

**Objective: Introduce indicators describing the employment of persons with disabilities.**

**Measure:**

14. Statistics Finland collected statistical data on the employment of persons with partial work ability and persons with disabilities in 2022 for the first time. Data is collected every two years. The MEAE will start using the statistical data to monitor the employment trends of persons with disabilities and persons with partial work ability.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

## **Fostering accessibility and access to information: measures and objectives**

**Objective: Promote accessibility in the ministries' activities and premises.**

**Measure:**

15. Pay particular attention to accessibility in all ministries' activities and facilities and the related training needs. Ensure that communication is accessible. Pay special attention to the accessibility of the events to be organised.

*Schedule:* continuous

*Responsible bodies:* all ministries

**Objective: Create preconditions for integrating accessibility into different information system projects and logical data models.**

**Measures:**

16. Implement a logical data model on the information components of the accessibility decree and offer it as part of a semantically interoperable and harmonised concept.
17. Maintain a terminological accessibility vocabulary of the built environment. Continue to consolidate the use of uniform conceptual definitions.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Promote suitable planning and accessibility of the building stock and the surrounding environment in new and renovation construction and as part of systematic property maintenance through information management and development activities. Support the work of building supervision authorities to ensure that they can exert influence through knowledge-based management.**

**Measures:**

18. Participating in the organisation of training events on accessibility and the Accessibility Decree through cooperation networks. Highlight the importance of accessible construction as a communicated message.
19. Produce a report on design suitable for all in the built environment.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Monitor the UNCRPD implementation in the enforcement of the accessibility decree. Take the different areas of accessibility into account in the development of accessibility legislation.**

**Measures:**

20. Carry out a functionality assessment of the accessibility decree and investigate in connection with it what development needs exist to ensure accessibility in the planning and building permit process.
21. Organise a discussion event for organisations for the persons with disabilities on the accessibility of the built environment.

*Schedule:* during the Action Plan period

*Responsible body:* ME

**Objective: Take accessibility and obligations under the UNCRPD into consideration in an appropriate manner in the drafting of the act on civil construction in public areas.**

**Measure:**

22. Examine accessibility as part of the regulation of the construction, maintenance and planning of public areas.

*Schedule:* 2024-2025

*Responsible body:* ME

**Objective: Continuing the development work initiated by the Prime Minister's Office, which aims to ensure the accessibility of government premises and services and equal opportunities for participation.**

**Measure:**

23. Coordinating the measures aiming to develop accessibility on government premises. Keep the accessibility information in the meeting rooms up to date in Senaattila. Carry out accessibility reviews and accessibility surveys (in connection with the planning of renovations) in cooperation with Senate Properties.

*Schedule:* continuous

*Responsible body:* Prime Minister's Office in cooperation with all ministries

**Objective: Promote the implementation of the linguistic rights of persons with disabilities.**

**Measure:**

24. Investigate the possibilities of assessing the realisation of the linguistic rights of persons with disabilities. Particular attention should be paid to the functioning of interpretation services and legislation organised in different administrative branches.

*Schedule:* during the Action Plan period, in preparation for the next government term

*Responsible bodies:* ministries

**Objective: Find out how the linguistic rights of speakers of Finnish and Finnish-Swedish sign language are realised.**

**Measure:**

25. Implement a sign language barometer.

*Schedule:* during the Action Plan period

*Responsible body:* MJ

**Objective: Develop the implementation of Kela's interpretation services for persons with disabilities.**

**Measure:**

26. a) Kela organises interpretation services for persons with disabilities by purchasing them from other service providers. With regard to interpretation services, investigate the possibility of using the registration procedure.
- b) Develop working life interpretation so that the customer's service needs are taken into account individually and comprehensively.
- c) Development of the foreign travel application form so that the application process would be as smooth as possible and the information needed to resolve the matter is "in order in one go".
- d) Investigate the possibility of implementing an information campaign for the interpretation service in cooperation with customer organisations, the target group being customers and other parties subject to the obligation to provide services.

*Schedule:* during the Action Plan period

*Responsible body:* Kela

## Goals and measures for ensuring safety and preventing hazardous situations

**Objective: Promote the equality of persons with disabilities in police work.**

**Measure:**

27. Continue the equality training provided by the police and take persons with disabilities into account as part of the training.

*Schedule:* continuous

*Responsible body:* MI

**Objective: Accessibility of the emergency contact.**

**Measure:**

28. Get the responding at the general emergency number to the level required by the Accessibility Directive and the amendments to the Act on Emergency Response Centre Operations that will enter into force on 28 June 2025 by the end of 2025.

*Schedule: 2025*

*Responsible body: MI*

**Objective: Engage and consult persons with disabilities in all preparations.**

**Measure:**

29. a) The project launched by the Ministry of the Interior will prepare instructions for rescue plans, the introduction and use of civil defence shelters, maintenance and inspections.  
b) The Ministry of the Interior will launch a phase II reform of the Rescue Act.  
c) The Ministry of the Interior will draw up an action plan for halving fires in 2024.  
d) The Ministry of the Interior will update the Action Plan for incident prevention in the rescue services by the end of 2024.  
Engage persons with disabilities in the above-mentioned preparatory work.

*Schedule: during the Action Plan period*

*Responsible body: MI*

**Objective: The authorities take into account the special needs of persons with disabilities in disruptions.**

**Measure:**

30. Special issues related to persons with disabilities are taken into account in the preparedness plans for social welfare and health care.

*Schedule:* during the Action Plan period

*Responsible body:* Wellbeing services counties in cooperation with MSAH

## Fostering independent living and inclusion: objectives and measures

**Objective: The new Disability Services Act must remain a special law in order to ensure the realisation of the rights of persons with disabilities and the availability of services.**

**Measure:**

31. Carry out legislative measures concerning the Disability Services Act out to ensure the implementation of the rights of persons with disabilities and the availability of services.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

**Objective: The implementation of the new Disability Services Act promotes the versatile introduction of services and the development of new operating models.**

**Measure:**

32. The implementation of the new Disability Services Act promotes the versatile introduction of services and the development of new operating models. Significant services include housing support as a whole, mobility support as a whole and services for children with disabilities. The starting point of the new Disability Services Act is that services are granted on the basis of individual needs.

*Schedule:* continuous

*Responsible body:* MSAH in cooperation with the Finnish Institute for Health and Welfare

**Objective: When the new Disability Services Act enters into force in early 2025, it is important to identify the needs for legislative monitoring.**

**Measure:**

33. Promote the monitoring of the new Disability Services Act. For example, it is important to obtain reliable information on the new services of the legislation and their implementation as well as the satisfaction of the service needs of persons with disabilities and the realisation of their rights, so that the realisation of the objectives of the legislation can be assessed.

*Schedule:* continuous

*Responsible body:* MSAH in cooperation with the Finnish Institute for Health and Welfare

**Objective: Promote the implementation of individual housing for persons with disabilities. Guide state-supported housing production for persons with disabilities in an individual and diverse direction.**

**Measures:**

34. Develop housing solutions and practices for persons with disabilities in cooperation with wellbeing services counties.
35. Promote the individual housing of persons with disabilities in state-sponsored housing production.
36. Support the accessibility of existing housing stock through renovation grants.

*Schedule:* during the Action Plan period

*Responsible body:* ME and ARA the Housing Finance and Development Centre of Finland in cooperation with the MSAH

## **Fostering the right to independent movement and mobility: objectives and measures**

**Objective: To secure sustainable mobility services with suitable means of transport for all. In order to ensure an adequate service level for mobility, the organisation of public transport must be examined as a whole. At the same time, it must be ensured that the resources allocated to the organisation of transport provide maximum added value. This requires a strong increase in the use of information related to the implementation of mobility services across administrative branches.**

**Measure:**

37. Promote the availability of accessible mobility services for the needs of different customer groups in accordance with the accessibility vision. Promote the realisation of accessibility in transport services and infrastructure and promote the availability and use of information on accessible mobility services.

*Schedule:* during the Action Plan period

*Responsible body:* MTC

**Objective: Development of staff training for service providers and producers. Service providers and producers recognise the needs of different special groups as well as the services and assistance they need by developing staff training so that it is possible to better meet persons with disabilities and limited functional capacity.**

**Measure:**

38. Promote the expertise of service providers and producers by continuing cooperation between different actors and administrative branches.

*Schedule:* during the Action Plan period

*Responsible body:* MTC in cooperation with different actors

## **Fostering equal opportunities for education and training: objectives and measures**

**Objective: Reform legislation on support for learning in pre-primary and basic education.**

**Measure:**

39. The aim of the reform is to secure sufficient support and reduce the administrative burden on teaching staff. The aim is to offer support for learning individually and in accordance with the pupil's needs, and that the forms of support are uniform, clear and versatile nationally. In addition, the necessary small-group teaching and the teaching provided in special classes are possible, and sufficient numbers of special needs teachers are ensured.

*Schedule:* the new legislation will enter into force on 1 August 2025

*Responsible body:* MEC

**Objective: Reform the legislation on support for learning in general upper secondary education.**

**Measure:**

40. The aim of the reform is to clarify the support for learning in general upper secondary education and to harmonise the chain of support for learning from early childhood education to upper secondary education. The aim is to secure the necessary support, guidance and multiprofessional support for learning for general upper secondary education students.

*Schedule:* the new legislation will enter into force on 1 January 2025

*Responsible body:* MEC

**Objective: Reform the legislation on support for learning in vocational education.**

**Measure:**

41. The aim of the reform is to clarify the support for learning in vocational education and to harmonise the chain of support for learning from early childhood education to upper secondary education. The aim is to secure the necessary support, guidance and multiprofessional support for learning for upper secondary education students.

*Schedule:* the new legislation will enter into force on 1 January 2026

*Responsible body:* MEC

**Objective: Assess the effectiveness of preparatory education for degree education and possible legislative changes**

**Measure:**

42. The report to be completed at the end of June 2024 examines the entity of preparatory education for programmes leading to qualifications in terms of statistics, different processes, strengths and development needs, fulfilment of the objectives and the operating environment. In addition, the entity is examined from the perspective of responding to the students' diverse needs, the functioning of the cooperation structures and how the preparatory education serves different groups. The aim of the report is to produce information for possible needs for legislative amendments.  
*Schedule:* the report will be completed in summer 2024, preparation of legislative amendments in autumn 2024.  
*Responsible body:* MEC

**Objective: Monitor the implementation of compulsory education.**

**Measure:**

43. Assessment of the achievement of the objectives of the compulsory education reform, the success of its implementation and its effectiveness as a compilation study that draws on the information obtained from thematic monitoring, reports and evaluations. The focus is on the realisation of the key objectives of the reform, especially the completion rate of upper secondary education, the increase in educational equality and non-discrimination, the prevention of exclusion, the improvement of the well-being of children and young people, and the transition to working life and further studies.  
*Schedule:* Monitoring period until the end of 2024  
*Responsible body:* MEC

**Objective: Secure the rights of persons with disabilities in the reform of legislation on restricted suitability**

**Measure:**

44. During the government term, a reform of the legislation on restricted suitability will be prepared on the basis of the development needs identified in the final report of the restricted suitability project. The UNCRPD and the Non-Discrimination Act will be taken into account in the reform of the restricted suitability legislation, and the possibility for disability organisations to participate in the preparation process will be ensured.

*Schedule:* The drafting of this legislation will start in spring 2025.

*Responsible body:* MEC

**Objective: Examine the availability of interpretation services in early childhood education and care, pre-primary and basic education.**

**Measure:**

45. For both sign language and speech-impaired interpretation services, clarity would be needed for children and young people. In early childhood education and care and pre-primary and basic education, the organisation of interpretation services is the responsibility of the education provider. No national statistical data is available on the organisation of the services. It would be necessary to examine how the right of children and young people to the interpretation services they need is realised in early childhood education and care/school. Other than teaching situations must also be taken into account; from the perspective of inclusion, for example, a teacher/assistance using native sign language is not always sufficient support.

*Schedule:* the examination requires funding, cannot set a schedule

*Responsible body:* MEC in cooperation with MSAH

## Improving access to rehabilitation and health services: objectives and measures

**Objective: Improving the working and functional capacity of persons with disabilities and enabling inclusion.**

**Measure:**

46. Develop rehabilitation on the basis of the rehabilitation committee's proposals and rehabilitation reform measures, taking into account the rehabilitation needs of persons with disabilities. The grounds for delivering medical rehabilitation aids will be updated. Assess the need to update the guide for referral to medical rehabilitation in relation to the rehabilitation needs of persons with disabilities.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

**Objective: Develop rehabilitation services, benefits and their implementation.**

**Measure:**

47. a) Kela develops rehabilitation services for Sámi speakers, family rehabilitation services for children with severe illnesses, and rehabilitation for lifestyle changes for people with diabetes and sleep apnoea.
- b) Investigate the possibility of removing the term “fault” (vika) in vocational rehabilitation from rehabilitation legislation
- c) In connection with the recommendations of the rehabilitation reform committee, a cooperation guideline was completed in spring 2024 for implementers of statutory rehabilitation benefits, with the aim of improving the smooth implementation of rehabilitation benefits implemented by different institutions. The deployment of the cooperation instructions will continue. In addition, the development needs related to the guideline are reviewed annually between the implementers. The aim is to improve customer guidance for primary services and smooth implementation.

*Schedule:* during the Action Plan period

*Responsible body:* Kela

**Objective: Streamline the use of an online medical certificate.**

**Measure:**

48. Plan an online medical report combining B and C statements. The statement is planned so that it is as easy and smooth as possible to use in health care. The aim is to increase the use of the online medical certificate.

*Schedule:* by the end of 2026

*Responsible body:* Kela

## Fostering equal employment and access to work: objectives and measures

**Objective: Secure the competence of different authorities and effective multidisciplinary cooperation in services promoting the employment of persons with disabilities.**

**Measure:**

49. Review existing training material and training practices and produce training material in cooperation with relevant parties.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH and MEAE

**Objective: Develop support for arranging working conditions and increase its recognition by employers and TE experts.**

**Measure:**

50. The use of support for arranging working conditions has been limited, partly because the support and its uses are not sufficiently well known. Investigate the coverage of the arrangement support and other services promoting the employment of persons with disabilities, and develop the arrangement support on the basis of the development needs obtained in the investigation. If necessary, training material and service descriptions for employers will also be produced.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

**Objective: Investigate the disability quota as part of the Ministry of Economic Affairs and Employment's survey of the models used in different European countries to support the hiring of people with challenging employment opportunities.**

**Measure:**

51. Review existing reports and research data on European disability quota models.

*Schedule:* during the Action Plan period

*Responsible body:* MEAE

## **Fostering an adequate standard of living and social protection: measures and objectives**

**Objective: Development of social security for persons with disabilities.**

**Measure:**

52. In the reform of social security, the life situations of persons with disabilities is taken into account. The reform ensures the inclusion of persons with disabilities and organisations representing them, and assesses and monitors the impacts on persons with disabilities, children, young people and families.

*Schedule:* during the Action Plan period

*Responsible body:* MSAH

**Objective: Develop the identification of the customers' benefit and service needs and the comprehensibility of decisions.**

**Measure:**

53. a) Kela is in the process of a trial across benefit limits in relation to young people, students and families with children. The aim is to develop the comprehensive identification of the benefit and service needs of the customer groups in question and thus to actively cooperate across Kela's benefit limits. Other customer groups will be included in the trial in stages.
- b) Develop the comprehensibility of benefit decisions related to work ability and functional capacity.

*Schedule:* during the Action Plan period and ongoing

*Responsible body:* Kela

**Objective: Develop and streamline the implementation of disability benefits.**

**Measure:**

54. a) Investigate the possibilities of improving the application form for disability allowance for persons under the age of 16 in the respect that it would be easier to describe the burden and being bound on the form.
- b) Strive to facilitate the application for disability benefits by increasingly granting longer benefit periods where possible, thus reducing the need to submit further applications for benefits.
- c) Develop acting on behalf of another person in OmaKela.
- d) Make increasing use of automation in identifying customers' benefit and service needs.
- e) Investigate the possibility of removing the term "fault" (vika) from disability benefit legislation.

*Schedule:* during the Action Plan period and ongoing

*Responsible body:* Kela

## Fostering participation in cultural, recreational and leisure activities and sport: objectives and measures

### **Objective: Assessment of the organisation and status of parasports in Finland**

#### **Measure:**

55. In Finland, elite sport has been assessed several times in the past decade, but parasport has not been taken into account thoroughly in the evaluations. The assessment produces an overall picture of the structures and organisation of parasports in Finland and assesses the functionality and effectiveness of the system. The assessment also examines the current state of the integration with sports federations. The evaluation produces development and action proposals for central government, the Finnish Paralympic Committee, the Finnish Olympic Committee and its elite sports unit, sports academies, KIHU and sports federations to develop parasports in Finland.

*Schedule:* evaluation to be completed in September 2024

*Responsible body:* MEC

### **Objective: Examine municipal services for applied physical activity.**

#### **Measure:**

56. Systematic analysis of applied physical activity services has been carried out approximately every four years since 2000. The previous report on municipal applied physical activity services applies to 2019. The report examines, among other things, the arranging/organisation of municipal services for applied physical activity and its position in the municipality, resourcing, services offered, support for organisations and sports conditions. Based on the results of the report, general and field-of-education-specific development recommendations for the education sector will be drawn up, which will enable better promotion of physical activity in education programmes.

*Schedule:* the report will be completed in August 2024

*Responsible body:* MEC

**Objective: Promoting the possibilities of persons with disabilities to participate in art and cultural activities.**

**Measures:**

57. Support the art and cultural activities of national disability organisations and communities by granting discretionary government transfers and support the availability and accessibility of art and culture.
58. Sustainability criteria (including the promotion of equality) will be introduced in the granting of community grants in the MEC's arts and culture sector.

*Schedule:* Action Plan period

*Responsible body:* MEC

**Objective: Take persons with disabilities and their special needs into account in the implementation of the Suomi liikkeelle mobility programme.**

**Measure:**

59. Take persons with disabilities into account in all mainstream measures under the Suomi liikkeelle mobility programme and implement targeted measures when funding is secured.

*Schedule:* 2024-2027

*Responsible bodies:* MEC and other ministries responsible for the measures under the Suomi liikkeelle mobility programme

**Objective: Improve the competence and methods of recreational service providers to develop the accessibility and usability of local nature.**

**Measure:**

60. Update the accessibility guidelines related to routes and structures on the basis of the Paralympic Committee's recommendations on accessible routes and structures in Metsähallitus's public building drawing collection.

*Schedule:* Subject to enablement by the 2025 funding, the development project of Metsähallitus's public building drawing collection project

*Responsible body:* MEC, ME, Metsähallitus

**Objective: Raising awareness of the accessibility of cultural activities.**

**Measure:**

61. Support national communities that provide information and support on accessibility and diversity issues.

*Schedule:* Action Plan period

*Responsible body:* MEC

**Objective: Promoting accessible library services.**

**Measure:**

62. During the performance agreement period 2024–2027, the Celia library of accessible literature will strengthen the abilities and competences of children and young people and their participation in culture by developing and offering materials, products and services suitable for children and young people with reading disabilities and by promoting cooperation between libraries and schools. The availability and customer orientation of the digital library services, including the listening application, offered by the Celia library of accessible literature will be improved.

*Schedule:* Action Plan period

*Responsible body:* MEC in cooperation with Celia library of accessible literature

## **Fostering the rights of persons with disabilities in international cooperation: objectives and measures**

**Objective: Finland will continue to promote the rights of persons with disabilities in the activities of the EU, the UN, the Council of Europe, the Organisation for Security and Cooperation in Europe (OSCE) and other international organisations.**

**Measure:**

63. Promote the rights of persons with disabilities as part of Finland's foreign and security policy in the EU, the UN, the Council of Europe and the OSCE and, where possible, in the activities of other international organisations. Take the rights of persons with disabilities into account in different policy processes and negotiations. Consult persons with disabilities and organisations representing them when formulating Finland's positions.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Raising awareness of the rights of persons with disabilities and mainstreaming these rights in development cooperation.**

**Measure:**

64. a) Comprehensively consider the rights of persons with disabilities in human rights and humanitarian training organised by the Ministry for Foreign Affairs. These have also been included in training on cross-cutting objectives and the implementation of a human rights-based approach.
- b) Support the activities of NGOs, emphasising a human rights-based approach and taking cross-cutting objectives into account. Require the consideration of the rights of persons with disabilities in project applications.
- c) Continue to develop guidelines and tools that promote the mainstreaming of the rights of persons with disabilities in all forms of development cooperation.
- d) Monitor funding for work with persons with disabilities and communicate that as part of development policy reporting.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Supporting projects that promote the rights of persons with disabilities politically and, as far as possible, financially.**

**Measure:**

65. a) Finland will continue its political and, where possible, financial support for activities supporting the rights of persons with disabilities and will pay particular attention to the implementation of the UN Disability Inclusion Strategy. Continue to support the UN Disability Partnership Fund where possible.
- b) Continue to implement the commitments made at the Oslo Summit on Disability and prepare to make new commitments at the 2025 Summit on Disability.
- c) Promote the meaningful participation of persons with disabilities in the planning, implementation and evaluation of projects.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Promoting the realisation of the rights of persons with disabilities through international advocacy, including steering group work.**

**Measure:**

66. Disability inclusion is one of Finland's priorities in cooperation with UN organisations and the International Red Cross and Red Crescent. Finland strongly highlights disability inclusion in the work of the organisations' boards and, where possible, supports the addition of this as a permanent topic. Finland's priorities also include strengthening the status of women and girls with disabilities, appointing persons responsible for disability issues in organisations and strengthening competence related to the rights of persons with disabilities.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Taking the rights of persons with disabilities into account in humanitarian crises.****Measure:**

67. a) Finland will continue to put emphasis on disability activities in humanitarian crises. As one of the measures, Finland will contribute to the continuation of the UN Disability Inclusion Strategy (UNDIS). Where possible, Finland will annually ask for the UNDIS reports of its key UN partners for review and organise a discussion around them. Finland encourages its partners to publish their reports.
- b) Finland supports the humanitarian work on the disability inclusion of UN and Finnish organisations, including with earmarked support, when appropriate. Finland measures the amount of support allocated to disability inclusion annually.
- c) Finland will contribute to the official adoption of disability inclusion as part of the humanitarian coordination system. The aim is that 1) disability inclusion would be the responsibility of an official coordination system and 2) a UN organisation would be designated as a leading organisation.
- d) Finland also promotes disability inclusion in the country-based pooled funds of the UN OCHA, which it finances.
- e) Finland strives to bring together disability organisations and humanitarian organisations by various means.

*Timetable: Continuous*

*Responsible body: MFA*

**Objective: Promote the rights and engagement of persons with disabilities in peace processes and peacebuilding together with and in consultation with disability organisations. Work to improve the accessibility of peace processes, to take into account the views and needs of persons with disabilities and to increase the engagement of persons with disabilities and their representative organisations in conflict prevention and resolution and peacebuilding.**

**Measure:**

68. a) Supporting practices that increase the inclusion of persons with disabilities in peace processes and dialogues supported by Finland.  
b) Advocacy work among actors in the field of mediation and in cooperation with partners in the field.  
c) Increasing the participation of persons with disabilities in peace mediation training organised and/or funded by Finland.

*Schedule:* continuous

*Responsible party:* MFA

**Objective: Promote the rights and active participation of persons with disabilities and disability organisations in the UN Peace and Security Pillar. Influence the normative work of the UN, such as negotiated resolutions, reports, statements and other documents, to increase the language supporting the rights and inclusion of persons with disabilities. In addition, actively influence exert influence through cooperation with the UN and support possibly given to the UN.**

**Measure:**

69. a) Seek to negotiate a wording that promotes the rights and active participation of persons with disabilities in UN peace and security resolutions and documents, such as in various resolutions on peacebuilding and political operations (SPM) and the report of the Special Committee on Peacekeeping Operations C34.
- b) Support the consideration of the rights and participation of persons with disabilities in wider UN processes such as the 2025 peacebuilding architecture assessment.
- c) In cooperation with the UN, as well as in policies, speeches and statements, emphasise the opportunities of persons with disabilities and disability organisations to participate and influence peacebuilding and other UN activities that promote peace and security.
- d) Promote attention to disability inclusion when implementing the agendas women, peace and security; youth, peace and security and climate and security.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Promote the participation of persons with disabilities in monitoring the implementation of international human rights treaties.**

**Measure:**

70. Support organisations that promote the rights of persons with disabilities in more extensive participation in monitoring the implementation of international human rights treaties, including providing UN treaty monitoring bodies with information on the realisation of the rights of persons with disabilities in each area to which the treaty in question applies, both for the committee's list of issues, the responses to which form the government's periodic report, and as the so-called independent parallel report submitted in addition to the government's periodic report.

*Schedule:* continuous

*Responsible body:* MFA

**Objective: Promote the inclusion of persons with disabilities and disability organisations in the review of Finland's first periodic report on the UN Convention on the Rights of Persons with Disabilities and raise awareness of the recommendations made to Finland by the Committee on the Rights of Persons with Disabilities.**

**Measure:**

71. a) Disseminate information about the review of Finland's first periodic report on the implementation of the UNCRPD prior to its consideration by the UN Committee on the Rights of Persons with Disabilities, including about disability organisations' possibility to submit written opinions ("parallel reports"), at the latest four weeks prior to the review, to the committee and to attend a closed hearing of the committee.
- b) Translate the conclusions and recommendations adopted by the UN Committee on the Rights of Persons with Disabilities on UNCRPD implementation into Finland's national languages (Finnish and Swedish).
- c) Disseminate information widely and in an accessible manner on the conclusions and recommendations made to Finland by the UN Committee on the Rights of Persons with Disabilities
- d) Organise a round table discussion on the recommendations made to Finland by the UN Committee on the Rights of Persons with Disabilities.

*Timetable: 2025-2026*

*Responsible body: MFA*

**Objective: Raise awareness of persons with disabilities of the UN Convention on the Rights of Persons with Disabilities.**

**Measure:**

72. a) Support, where possible, the participation of a representative of disability organisations in the annual session of the Conference of the Parties to the UN Convention on the Rights of Persons with Disabilities in New York as part of the Finnish delegation.
- b) Encourage disability organisations to comment on the drafts of general comments produced by the Committee on the Rights of Persons with Disabilities, which comprise the committee's interpretations of the content and application of the Convention's articles.
- c) Distribute with wide circulation the general comments adopted by the Committee on the Rights of Persons with Disabilities.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Strengthening the rights of girls and women with disabilities in international cooperation.**

**Measure:**

73. Finland promotes the rights of women and girls with disabilities in cooperation with UN organisations. Finland encourages organisations to regularly include disability inclusion and, in particular, the promotion of the situation of women and girls with disabilities in board meetings and their activities. Finland cooperates with UNICEF in promoting the rights of women and girls with disabilities, including through the learning innovation and innovative funding centres based in Helsinki.

*Schedule: continuous*

*Responsible body: MFA*

**Objective: Ensure effective national implementation of the EU Disability Strategy.**

**Measure:**

74. Distribute information nationally on the EU Disability Strategy and its implementation, especially through the Advisory Board for the Rights of Persons with Disabilities (VANE). Implement the EU Disability Strategy's measures for member states in different administrative branches.

*Schedule:* continuous

*Responsible bodies:* MSAH in cooperation with other ministries

**Objective: Promote the implementation of the UN Convention on the Rights of Persons with Disabilities and the mainstreaming of disability issues through Nordic cooperation in the disability sector.**

**Measure:**

75. In particular, during the presidency of the Nordic Council of Ministers in 2025, the mainstreaming of disability issues in Nordic cooperation will be promoted. During the presidency year, strive to promote the implementation of the UN Convention on the Rights of Persons with Disabilities, in particular by taking into account the strengthening of the knowledge base and the intersectional perspective.

*Schedule:* especially 2025, continuous

*Responsible bodies:* MSAH in cooperation with Finnish Institute for Health and Welfare and other ministries

ISSN pdf: 1797-9854  
ISBN pdf: 978-952-00-8470-7



Ministry of  
Social Affairs and Health

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