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OPD Report on the Accessibility of Freedom of Expression, Information, and Political Participation in Finland

Submitted by AccessibilityAtlas

an organization of young persons advancing disability rights throughout the world

for the

33rd Session of the Committee on the Rights of Persons with Disabilities 11-29 August 2025

Submitted 13 July 2025

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Introduction

AccessibilityAtlas presents this report to the United Nations Committee on the Rights of Persons with Disabilities ahead of the 33rd session for the review of Finland. AccessibilityAtlas is a global non profit organization based in the United States, committed to creating a world where people of all abilities can fully participate in their communities.

Accessibility Atlas collaborates with civil society, international mechanisms, institutions of higher education, and local governments to catalyze change around the thematic issues of accessibility in civics and education for persons with disabilities worldwide. We actively engage with the United Nations human rights mechanisms in Geneva and beyond, to address accessibility gaps and advocate for systemic solutions.

Our reporting process involves comprehensive research on nation-states under review by the CRPD Committee, dialogue with civil society and individuals with disabilities in those countries, and collaborative drafting of reports to highlight successes, challenges and gaps in accessibility.

This petition is centered on two main issues covered under the lens of accessibility: (1) freedom of expression and opinion, and access to information; and (2) participation in political and public life

Freedom of Expression and Opinion, and Access to Information

Access to Public Information

As of 2019, websites and digital services are required to follow accessibility standards under the Act on the Provision of Digital Services (306/2019). In compliance, many government

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sites have published accessibility statements and meet these requirements, but some are inconsistent and still fall short of full compliance.¹

Finland has a strong legal framework in place to provide support to access public information, supporting the implantation of the Act on the Provision of Digital Services, pursuant to the Convention on the Rights of Persons with Disabilities. Since 2015, Finnish Sign Language (FinSL) and Finnish-Swedish Sign Language (FinSSL) have been recognized as national languages under the Sign Language Act (359/2015), which requires authorities to promote the right of sign language users to "use their own language and receive information in their own language." In partnership with informational videos on citizens' language rights in both FinSL and FinSSL released by the Ministry of Justice in 2018, many government websites now include brief sign-language video summaries of services and rights. Visual accessibility has also been promoted through toolkits for pictograms and easy-to-understand graphics in public communications.

Despite the legal framework, many government videos still lack captions and/or sign language interpretation. Nearly 700,000 people in Finland (12% of the population) require Easy Read language.⁵ Yet, a national survey discovered that roughly 10 percent of municipalities had never offered Easy Read format within their materials, and a mere one-third had only provided an extremely small amount of public information in simplified language.⁶ Furthermore, other digital services are at times completely absent. A 2021 audit by the Accessibility Ombudsman found many municipal websites lacked alt-text for images and were poorly navigable via screen readers, leaving those with cognitive disabilities struggling when attempting to access the

https://www.opengovpartnership.org/members/finland/commitments/fi0030/#:~:text=One%20important%20element%20in%20sharing,Online%20services%20must

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 $\frac{https://www.opengovpartnership.org/members/finland/commitments/fi0030/\#:\sim:text=One\%20important\%20element\%20in\%20sharing,Online\%20services\%20must}{}$

⁵Open Government Partnership:

 $\frac{https://www.opengovpartnership.org/members/finland/commitments/fi0030/\#:\sim:text=One\%20important\%20element\%20in\%20sharing,Online\%20services\%20must}{}$

⁶Government of Finland:

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¹Open Government Partnership:

²Government of Finland:

³Government of Finland:

⁴Open Government Partnership:

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information.⁷ Despite the Finnish Act on the Openness of Government Activities (621/1999), which mandates that everyone has the right to information from official documents, persons with disabilities continue to encounter barriers in accessing public information.⁸ Most importantly, formats like Easy Read, Braille, and signed videos depend on skilled translators and funding, yet the Finnish Disability Forum reports that nearly all essential services are provided via telephone, limiting access for the deaf community.⁹ This often-overlooked practice violates the Finnish Act on the Openness of Government Activities (621/1999) and undermines the full implementation of the Convention on the Rights of Persons with Disabilities. Over 500,000 citizens of Finland require the use of Easy Read formats.¹⁰ Nonetheless, essential documents, including voting instructions and public notices, continue to be drafted in unnecessarily complex legal terminology, resulting in widespread misunderstanding or, in some cases, rendering them entirely inaccessible.

We urge the Committee to ask: What steps is the Finnish delegation taking to ensure that all public sector websites and essential government communications, including voting instructions, are consistently available in accessible formats such as Easy Read, Braille, captioned and signed video, and screen reader—compatible layouts?

Despite progress in legislative frameworks, widespread inaccessibility persists across digital public services in Finland. We urge the Committee to recommend that Finland fully implement the Act on the Provision of Digital Services by allocating targeted funding for the training and hiring of certified translators in Easy Read and Finnish Sign Language, and by mandating accessibility audits for all municipal websites. The Committee should also emphasize the need for accessible publication of all essential civic materials—including voting information and legal notices—in simplified, multimodal formats to ensure equal access to public life for all persons with disabilities.

https://www.saavutettavuusvaatimukset.fi/fi/valvonta/raportti-valvonnasta-2020-2021?utm

 $\frac{\text{https://yhdenvertaisuusvaltuutettu.fi/en/rights-of-people-with-disabilities\#:}\sim:text=On\%20the\%20formal\%20level\%2}{C\%20the,and\%20a\%20lack\%20of\%20knowledge}$

https://vammaisfoorumi.fi/finnish-disability-forum-initial-alternative-report-of-finland/#:~:text=In%20addition%20to%20technical%20accessibility%2C.of%20people%20close%20to%20them

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⁷Saavutettavuusvaatimukset:

⁸The Non-Discrimination Ombudsman:

⁹Finnish Disability Forum

¹⁰Government of Finland:

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<u>Linguistic Rights of Persons with Disabilities and Implementation of Related Regulations</u>

Finnish Sign Language (FinSL) and Finland-Swedish Sign Language (FinSSL) are the two recognized sign languages in Finland, with approximately 4,000 to 5,000 Deaf or hard-of-hearing people in Finland using FinSL as their native language, and in total, an estimated 10,000 to 14,000 individuals having the ability to communicate in FinSL. ¹¹ In contrast, a small number of users practice FinSSL, with recent studies indicating that only about 90 persons with disabilities now use the language. ¹² Despite the small number of people using FinSL and FinSSL, the linguistic rights of users must be equivalent to other native languages. Accordingly, authorities have a responsibility to ensure that sign language users receive information in a manner that is most appropriate and accessible to them.

The current status of Finland's accommodations for sign language users in police interactions is commendable, despite most police officers not knowing FinSL. Interpreters are usually provided when needed for formal interviews in an efficient manner.¹³ Although adequate accommodation is provided during interviews, the Finnish Association of the Deaf (FAD) reports that the linguistic rights of sign language users are poorly implemented in everyday interactions, further exacerbated by services such as police and emergency responders lacking skills in basic sign language interactions.¹⁴

The government's enactment of the Sign Language Act has been a key measure to strengthen linguistic rights by requiring all public authorities to consider the needs of sign language users in their activities and services. Since its implementation, the Act has undergone review of regulations in various fields. For example, in 2023, Finland amended the Act so that its regulations extend to the new regional health and social care authorities, which ensured that, after the health and social services reform, sign language users' rights would continue to be safeguarded. To uphold the rights of the Finnish-Swedish Deaf minority, the government also

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¹³Government of Finland:

https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#:~:text=the%20Finnish%20Association%20of%20the.248

¹⁴Government of Finland:

https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#:~:text=the%20Finnish%20Association%20of%20the,248

¹⁵Government of Finland:

https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#:~:text=the%20Finnish%20Association%20of%20the.248

¹⁶Government of Finland:

https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#:~:text=the%20Finnish%20Association%20of%20the,248

¹¹Government of Finland:

¹²Government of Finland:

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launched a program for FinSSL, including special funds that have been set aside to support FinSSL. Notably, the Ministry of Education and Culture funded interpreter training run by Humak University of Applied Sciences Finnish-Swedish Sign Language in 2018 and 2019 (the first of its kind) to increase the number of FinSSL interpreters.¹⁷ Most importantly, however, the Finnish government has formed a Sign Language Advisory Board that includes Deaf community representatives, and oversees the implementation of the Sign Language Act. The board studies progress in different sectors and advises on improvements afterwards to maintain fair linguistic rights.¹⁸ Additionally, the National Advisory Board on Language Affairs (Kieliasiainneuvottelukunta) now regularly considers sign languages along with Finnish, Swedish, and Sámi in its reports, including a report on the application of language legislation (submitted to Parliament) every four years.¹⁹

Despite laws, deaf community members continue to report having been at health appointments or social service meetings where no interpreter was present and struggling to follow along, showing that the legal provisions have not fully permeated operational practice. Issues have also been particularly noticeable in sparsely populated northern Finland or outside major cities, as getting a qualified interpreter or service provider who speaks one's language (FinSL, FinSSL, Sámi, etc.) can involve long delays. The Sámi Parliament noted that the interpreter system for Sámi languages in emergencies is "non-functional in urgent cases" and recognized similar issues with those involving sign language in emergencies. Lastly, the critically low number of FinSSL users and interpreters has been a major problem, as its users especially lack services in their preferred language, simply because no one nearby understands it. While reincorporation efforts are underway, FinSSL speakers currently experience inequality and may be forced to use Finnish Sign Language, creating unbalanced treatment despite retaining the same linguistic rights as others.

We urge the Committee to ask: How does the Finnish delegation plan to address persistent service gaps for sign language users—particularly in health, emergency, and rural settings—and ensure equal access for both FinSL and FinSSL users, as guaranteed under the Sign Language Act?

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https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#;~:text=the%20Finnish%20Association%20of%20the,248

¹⁷Government of Finland:

¹⁸Government of Finland:

¹⁹Government of Finland:

²⁰Government of Finland:

²¹Government of Finland:

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While Finland has taken meaningful steps to enshrine the linguistic rights of sign language users into law, gaps remain in everyday implementation. We urge the Committee to recommend that Finland expand funding for on-demand remote interpretation services, increase regional training programs for FinSSL and FinSL interpreters, and require basic sign language proficiency training for frontline service providers such as police, healthcare workers, and emergency responders. The Committee should also encourage regular impact assessments, led by Deaf community representatives, to ensure that FinSSL and FinSL users can access essential services without delay or linguistic compromise—especially in rural and northern regions.

Presence of Sign Language Interpreters and Lack Thereof

Deaf and deafblind persons across Finland rely on interpreter services to fully participate in society. In Finland, a national interpreter service for persons with disabilities, administered by the Social Insurance Institution (Kela), provides free sign language or speech-to-text interpretation for those who need it in daily life. This service is demand-based, requiring Deaf individuals to request an interpreter for a doctor's visit, a court hearing, a lecture, or a work meeting, etc., and Kela will arrange and cover the cost.²² Recently, data found that around 600 to 670 professional sign language interpreters are working in Finland, with about 650 interpreters for Deaf and hard-of-hearing clients and an additional 350 interpreters trained for deafblind interpreting.²³ These interpreters support approximately 5,000 Deaf FinSL users. While Kela may seem strong on paper, issues relating to high turnover and geographical distribution have become substantial.²⁴

Annually, any Deaf person is entitled to 180 hours of interpreters and deafblind users to 360 hours by Kela.²⁵ Despite the approximately 600 active sign language interpreters, Deaf persons still report shortages, especially in situations with limited time.²⁶ This can be attributed

https://rm.coe.int/finlandpr6-app2-en/1680ab57ae#:~:text=the%20Finnish%20Association%20of%20the.248

https://www.nubsli.com/nub-posts/hundreds-finnish-sign-language-interpreters-lost-jobs-overnight/#:~:text=.Earlier

https://www.ohchr.org/sites/default/files/Documents/Issues/Disability/ProvisionSupport/States/Permanent_Mission_of Finland.docx

https://www.regeringen.ax/sites/default/files/attachments/page/crpd_initial_report_finland_august_2019.pdf#:~:text = Association%20of%20Finn%02ish%20Local%20and,read%20language.34

²²Government of Finland:

²³National Union of British Sign Language Interpreters:

²⁴UN OHCHR:

²⁵Government of Finland:

²⁶European Union of the Deaf:

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to Kela's attempt to provide national coverage, through its service zones²⁷, but rural and northern areas often lack local interpreters. This leaves clients, especially those requiring tactile deafblind interpreting or Finnish-Swedish Sign Language ("FinSSL") interpretation, waiting on aid to travel across the country. This poor system has not only affected Deaf persons but also interpreters themselves. In a survey of Kela's interpreters, 56% of those who were surveyed said Kela's training system has negatively impacted the profession, with mismatches between interpreter skills and client needs.²⁸ Additionally, in 2018, Kela cut interpreter contracts, leaving "hundreds" without regular work, leading to dissatisfaction, lower pay, and many interpreters exiting the profession or freelancing, disrupting service nationwide.²⁹

In recent years, funding for interpreter procurement has grown, with Kela budgeting €49 million in 2018 for purchasing interpreting services, compared to €42.9 million in 2016.³0 This gradual increase in funding shows the government's effort to keep services available while maintaining interpretation free of charge for users. To confront geographical issues, Kela now operates through regional centers and has recently offered remote interpreting via video link.³¹ To face rising protests and poor feedback from interpreters, the government and Kela have started to change wage designation. In late 2021, interpreter representatives collectively called for better contract terms, and since then, Kela's newest contract (for 2025 onward) balances wage and quality of interpreting services. Instead of accepting the lowest bid, Kela notes it will consider factors like experience and client satisfaction in awarding contracts.³² The Finnish government has also stepped in and granted funding for Finish-Swedish Sign Language interpreter training in 2018 to 2019, and through the Ministry of Education, has maintained the interpreter training program intake, expecting approximately 15 to 20 new sign language interpreters to graduate each year from HUMAK.³³

²⁷Kela:

https://www.kela.fi/interpreter-service-for-the-disabled-interpreter-list#:~:text=Service%20areas

 $\frac{https://open.clemson.edu/cgi/viewcontent.cgi?article=1031\&context=ijie\#:\sim:text=,the\%20work\%20of\%20individual\ \%20interpreters}{}$

https://www.nubsli.com/nub-posts/hundreds-finnish-sign-language-interpreters-lost-iobs-overnight/#:~:text=.Earlier

https://www.regeringen.ax/sites/default/files/attachments/page/crpd_initial_report_finland_august_2019.pdf#:~:text = Association%20of%20Finn%02ish%20Local%20and.read%20language.34

https://www.regeringen.ax/sites/default/files/attachments/page/crpd_initial_report_finland_august_2019.pdf#:~:text = Association%20of%20Finn%02ish%20Local%20and,read%20language.34

 $\frac{https://cris.tuni.fi/ws/portalfiles/portal/146285791/Public_service_interpreting.pdf\#:\sim:text=problem\%20is\%20that\%20the\%20price, Demands\%20were\%20uttered\%20for$

²⁸Clemson:

²⁹National Union of British Sign Language Interpreters:

³⁰Government of Finland:

³¹Government of Finland:

³²FITISPos.

³³Government of Finland:

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Despite commendable training efforts, the number of interpreters rarely aligns with demand, and may decline if trends continue. Interpreter conditions remain harsh with current workers citing low pay, unstable freelance-style contracts, and heavy workloads. Unless these issues are addressed, turnover will continue and positions will be difficult to replace, especially as many interpreters are nearing retirement. Geographical discrepancies persist, especially in unattractive rural areas, due to fewer clients and longer travel distances for interpreters. The government has not yet responded with a clear strategy to guarantee equal regional coverage, and as a result, Deaf people in remote municipalities still experience delays or have to rely on remote interpretation. Kela's wages also remain an issue, as until its 2025 regulations on price-to-quality ratio take effect, interpreters will worry about a "race to the bottom" effect on their profession and use of "completely incompetent interpreters" in meetings will persist.³⁴

We urge the Committee to ask: What specific steps will the Finnish delegation take to ensure sustainable interpreter services across all regions—including rural and northern areas—and to protect interpreters from poor labor conditions that threaten service availability for Deaf and deafblind users?

While Finland's interpreter system is well-established in law, implementation remains inconsistent and fragile in practice. We urge the Committee to recommend that Finland develop a national workforce strategy to ensure sustainable, high-quality interpreting services, including improved pay standards, stable contracts, and recruitment incentives for interpreters in underserved areas. The Committee should also advocate for real-time monitoring of interpreter shortages, a minimum service guarantee for remote municipalities, and a client-centered quality evaluation system—particularly for FinSSL and deafblind interpretation—to ensure every person receives services in their preferred language and modality without delay.

Participation in Political and Public Life

Accessibility Barriers in Practicing Electoral Rights

Although there are numerous legal provisions requiring municipalities ensure the accessibility of polling stations, implementation remains limited. Furthermore, the fundamental right of casting a secret is compromised for persons with disabilities in Finland due to inadequate provisions for independent voting through electronic voting systems. In public feedback from the

https://www.mtvuutiset.fi/artikkeli/tulkeilla-ei-koulutusta-asioita-jatetaan-kaantamatta-ja-tulkit-poistuvat-kesken-kas ittelyn-oikeusturva-vaarantuu-epapatevien-tulkkien-vuoksi/8223414

³⁴MTVUUTISET:

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2023 parliamentary elections of Finland, one-third of respondents encountered accessibility problems at polling stations.³⁵ These included slippery walkways, missing or insufficient guidance to accessible routes and entrances as well as poorly ploughed parking spaces. Moreover, this issue was aggregated by the heavy doors and high thresholds that prevented independent access to polling stations. Currently, blind individuals in Finland remain dependent on assistants to mark their ballots, compromising the secrecy and independence of their vote. While the Ministry of Justice issues instructions to all election committees that includes information on accessibility, the training for election authorities and officials on the grounds is not required by law.

In response to these issues, a parliamentary working group has been appointed to prepare legislation which ensures accessibility of polling stations and council chambers, with the mandate being extended to December 31, 2025. According to Finland's reply to the list of issues, the Government of Åland and the disability organization Funktionsrätt Åland have jointly arranged election training debates before general elections in order to improve the provision of information on the possibility of at home-voting. According to the election (2019:45) of Aland, the accessibility of electoral material is checked together with disability organizations, information leaflets on elections are published in plain Swedish, and election training can be attended via Teams or watched online afterwards. Moreover, the Ministry of Justice provides information on elections in 21 plain languages as well as braille and sign language, paired with NGO collaboration in disseminating information.

The main challenge faced by the Ministry of Justice's instructions for polling station accessibility is the lack of legally binding standards. The reliance on non-binding guidelines leads to inconsistent and inadequate provisions across the country. The idea for at home voting was to be implemented by December 2023, yet the government has failed to report any measurable or significant statistics related to this. Finland's Disability Policy Programme (VAMPO) has recognized the need to develop an electronic voting system to ensure independent decision making alongside accessibility for persons with disabilities. Despite this recognized need, accessible electronic voting is not yet available in Finland.

We urge the Committee to ask: What measures will the Finnish delegation take to guarantee the secrecy and independence of voting for persons with disabilities—particularly blind voters—and to establish binding national standards for polling station accessibility?

Despite legal requirements, persons with disabilities in Finland continue to face physical, informational, and procedural barriers to equal participation in elections. We urge the

 $\frac{https://www.edf-feph.org/article-29-of-the-crpd-on-participation-in-political-and-public-life-overview-of-the-crpd-committee-recommendations-to-eu-member-states/$

https://www.euroblind.org/campaigns-and-activities/current-activities/accessible-voting

³⁵European Disability Form:

³⁶EuroBlind:

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Committee to recommend that Finland adopt enforceable national accessibility standards for polling stations, mandate accessibility training for all election workers, and expedite the development of an accessible electronic voting system to ensure independent and secret voting for blind and visually impaired persons. The Committee should also call for systematic data collection on barriers encountered in each election cycle, disaggregated by disability type and region, to guide evidence-based improvements to the electoral process.

<u>Underrepresentation of Persons with Disabilities in Decision Making</u>

As of 2024, there is "no data identified "on persons with disabilities being members of the current national parliament.³⁷ The Library of Parliament's information service reports that there are currently zero members of Parliament which have indicated a need for assistive devices, indicating a severe lack of representation. Similarly, there is no significant statistical information reported on the number of members with disabilities in the municipal government.

In response, there have been sensitization programs and advocacy initiatives in political cabinets. For example, the government of Finland has championed gender equality and focuses on inclusion of women with disabilities in development meetings. The Helsinki Pledges on Gender Sensitive Parliaments 2025, call for the identification and removal of barriers for women from underrepresented groups such as those with disabilities. A significant part of Finland's strategy for solving this core issue involves the establishment and support of financial and political consultative bodies. The National Council on Disability (VANE) serves as an important national body which brings together organizations of persons with disabilities. Half of VANE's 18 members must have a form of disability. Unfortunately, Municipal Disability Councils do not follow VANE's standard.

We urge the Committee to ask: What concrete steps will the Finnish delegation take to promote the political participation and representation of persons with disabilities—particularly in national and municipal governments—and to ensure the systematic collection of disaggregated data on candidates and elected officials with disabilities?

The complete absence of self-identified members of Parliament with disabilities in Finland signals persistent structural barriers to full political participation. We urge the Committee to recommend that Finland adopt targeted measures to support the candidacy of persons with disabilities, such as political mentorship programs, accessible campaign financing, and mandatory accessibility requirements for party activities. The Committee should also call on Finland to require municipal disability councils to adopt participatory standards aligned with VANE's model, and to introduce voluntary self-identification protocols to collect data on the

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³⁷ VANE:

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representation of persons with disabilities in political office while respecting privacy and dignity.

Conclusion

While Finland has taken commendable legislative steps to protect the rights of persons with disabilities, critical gaps remain in the practical implementation of accessibility, inclusion, and equal participation—particularly in the domains of public information, interpreter services, electoral processes, and political representation. Inconsistent enforcement, inadequate funding, and a lack of binding national standards continue to hinder full compliance with the Convention on the Rights of Persons with Disabilities. We urge the Committee to call on Finland to adopt concrete, measurable, and enforceable policies that ensure persons with disabilities are not merely protected on paper, but fully included in practice. Sustainable progress requires not only stronger oversight mechanisms but also the active participation of persons with disabilities in shaping the systems that govern their lives.

This report may be published on the CRPD webpage to the general public. Direct enquiries to admin@accessibilityatlas.org. This report was authored by Henry Ross, Dinu Antonescu, and Mrigank Bhargava.