



Case number: VN/16610/2023

SAMS -Samarbetsförbundet kring funktionsnedsättning

SAMS – the Swedish speaking Co-operative Federation on Disability Issues (here on after “SAMS”) welcomes the possibility to provide comments for the GREVIO 2nd periodic report in Finland. SAMS would like to bring the following remarks to your attention in relation to the list of questions brought forward.

Part I: Changes in comprehensive and co-ordinated policies, funding and data collection in the area of violence against women and domestic violence

Article 7: Comprehensive and co-ordinated policies

The Finnish Criminal Code has been reformed concerning sexual abuse. This can be seen as progress relating to women’s rights. Although this, there is still some incoherence concerning people with disabilities. The sanctions for sexual abuse are lower if the victim lives in a hospital or institution. This is an incoherency that affects the equal rights for people with disabilities depending on where the crime is committed.

Article 11: Data collection and research

The Finnish Institute of Health and Welfare (THL) published a study where the result shows that people with disabilities face more domestic violence. Women and girls with disabilities also face more of other forms of violence than individuals without a disability.

SAMS emphasizes the need for more data collection and research about intersectionality. We need more information about what kind of challenges people with disabilities that also belong to another minority e.g., a language minority or sexual minority have. There is not enough research and statistics about intersectionality and about the potential differences it entails.

Part II: Information on the implementation of selected provisions in priority areas in the field of prevention, protection and prosecution

Article 31: Custody, visitation rights and safety

Judges, court-appointed experts, and other legal professionals should have adequate knowledge and training on the special features of violence faced by people with disabilities.



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Article 51: Risk assessment and risk management

Disability should be included in risk assessments as people with disabilities face more violence. Intersectional viewpoints should also be considered in risk assessments.

Part III: Emerging trends on violence against women and domestic violence

It is important to take into consideration that the concept of violence in many ways can differ when the victim is a person with a disability. Persons with disabilities are often more dependent on other individuals. The violator can for example be a personal assistant, a relative or another assisting person which makes it harder for the victim to break free. This involves neglect of assistance, economic abuse, physical, and psychological violence. Often, it is not "defined" what constitutes violence, so many are not even aware that they are being subjected to it. Because of the complexity of the matter, it would be important to do more research about violence against women with disabilities. Most importantly we need actions to solve this problem.

There have been problems with accessibility in shelters in Finland e.g., it can be physically impossible for a person with a disability to enter a shelter. Accessibility has improved during the recent years but there is still improvement to be made concerning accessibility in shelters.

SAMS suggests a large-scale survey across Europe on violence against individuals with disabilities, with a particular focus on the specific circumstances faced by women, children, and elderly individuals with disabilities. The survey should ascertain the actual situations they encounter and facilitate the development and adoption of comprehensive legislation and policies to counteract violence.

Part IV: Administrative data and statistics

Administrative and judicial data should recognize individuals with disabilities and hate crimes.

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